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FINAL WALKER

PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT WALKER RESOURCE AREA

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UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
CARSON CITY DISTRICT
CARSON CITY, NEVADA

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PROPOSED RESOURCE MANAGEMENT PLAN

AND FINAL ENVIRONMENTAL IMPACT STATEMENT

for the

WALKER RESOURCE AREA

NEVADA

Prepared by the

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
CARSON CITY DISTRICT

Edward F. Spang
Nevada State Director

The proposed resource management plan is a long-range plan to manage 1.9 million acres of public land within the Walker Resource Area. The plan has been prepared in response to Sections 202 and 603 of the Federal Land Policy and Management Act of 1976 that require the Bureau of Land Management to develop land use plans for public lands and to study the suitability of certain lands for wilderness designation. An integral environmental impact statement assesses the environmental consequences of the plan.

This document is both the proposed resource management plan and the final environmental impact statement. The final resource management plan will be approved by the State Director and published in a record of decision following public review of this document. Wilderness recommendations in the plan are preliminary and subject to change during administrative review. A separate legislative final environmental impact statement for wilderness has been prepared as required by the Bureau's Wilderness Study Policy.

For further information contact: Thomas J. Owen, District Manager, Bureau of Land Management, 1050 E. William, Suite 335, Carson City, Nevada 89701 (702-882-1631).

Date this final statement was made available to the Environmental Protection Agency and to the Public:

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SUMMARY

INTRODUCTION

The Bureau of Land Management is proposing to implement a Resource Management Plan (RMP) for the Walker Resource Area of the Carson City District, Nevada. The plan is being prepared to provide a comprehensive framework for future management of public lands in the Resource Area. This document includes both a Proposed RMP and a Final Environmental Impact Statement (EIS) on the RMP.

The Walker Resource Area consists of the Pine Nut, Markleeville, Mina, and Walker Planning Units. The RMP covers all of these units. However, since land use decisions for the Pine Nut and Markleeville units were issued in 1983 as part of the Reno Management Framework Plan (MFP), analysis in this document will be limited to the Mina and Walker units. These two units will be called the Walker Planning Area for the purposes of this document. Land use decisions in the Reno MFP which pertain to the Pine Nut and Markleeville units will be incorporated by reference into the Walker RMP.

The planning area contains about 1.9 million acres of public land. Seventy-nine percent of the total (1.5 million acres) is located in Mineral County, eighteen percent (340,000 acres) is located in Lyon County, and four percent (70,000 acres) is located in Douglas County (Walker Resource Management Plan Area Map).

The Draft RMP focused on resolving three key resource management issues:

1. Rangeland Management. This issue is concerned with the use of rangeland resources by livestock, wild horses and burros, and wildlife.

2. Wilderness. This issue is concerned with the amount of acreage to be recommended suitable or nonsuitable for wilderness designation.

3. Land Tenure/Rights-of-Way Corridors. This issue is concerned with the amount of land identified as potentially suitable for disposal from federal ownership and what areas, if any, are suitable for rights-of-way corridors.

Although not considered an issue, potential Areas of Critical Environmental Concern (ACECs) were also analyzed in detail.

Five alternatives were prepared for the Draft RMP. A preferred resource management plan and four alternatives examined different solutions for the three issues. These alternatives were:

Alternative A: This alternative represents a continuation of present resource management and use levels. Actions would be taken on a case-by-case basis as circumstances dictate.

Alternative B: This is the preferred alternative/Proposed RMP. It provides for the optimum mix of natural and commercial resource uses based on the relative value of those uses. It has been selected as the Proposed RMP since it best meets the public's demand for goods and services while minimizing

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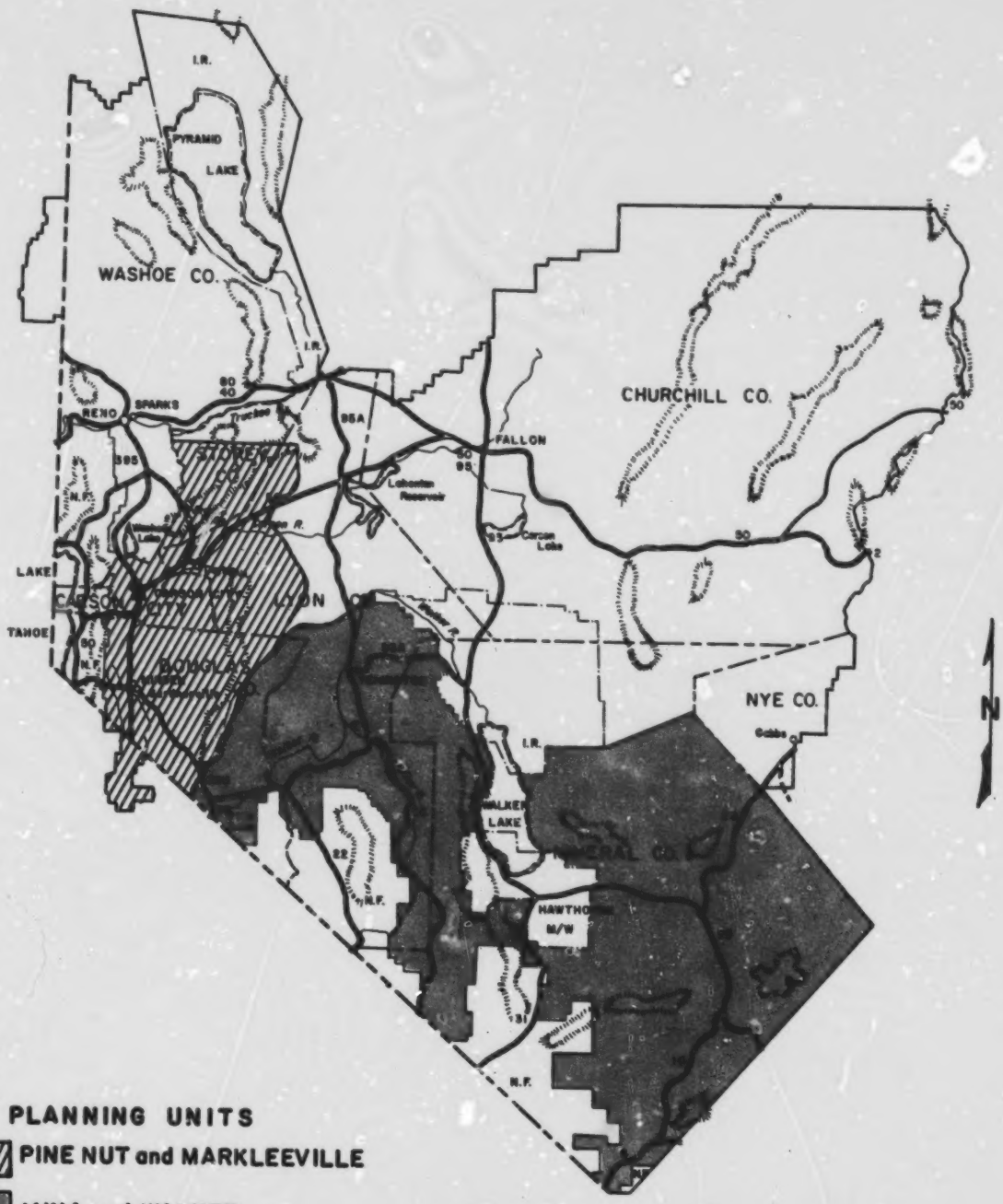

CARSON CITY DISTRICT

Walker Resource Management Plan (RMP) Area

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disruption of the human environment. Several changes have been made in this proposal since the Draft to reflect public comments and additional data and analysis. These changes are outlined in Summary Table 1.

Alternative C: This alternative is oriented towards production of commercial resources with emphasis on livestock, minerals, land disposals, and utility corridors. It was modified in response to public comments during the Scoping Process to provide for a moderate level of wilderness designation.

Alternative D: This alternative provides for protection and enhancement of natural values with emphasis on wildlife, wild horses and burros, and wilderness.

Alternative E: This alternative was developed to provide for the mandatory "all wilderness" analysis and to provide for an analysis of elimination of livestock grazing.

Comparative summaries of the major management actions and environmental consequences of each alternative are displayed in the following tables.

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SUMMARY TABLE 1
ALTERNATIVES

Alternative	ISSUE: Range Management	Wilderness/ACECs	Land/Tenure Rights-of-Way Corridors
A	Continue existing livestock grazing at the current use level of 36,962 AUMs. No change in active preference.	No wilderness study areas would be recommended as suitable.	No land disposal areas would be established. Disposals would be handled on a case-by-case basis.
	Continue implementation of Allotment Management Plans (AMPs) for livestock on five allotments.	No areas would be designated as ACECs.	No rights-of-way corridors would be established. Rights-of-way would be handled on a case-by-case basis.
	Manage wild horses and burros at a level of 1174 horses and 129 burros, a ten percent decrease from current levels.		
	Maintain wildlife habitat for existing numbers of mule deer, antelope, and bighorn sheep, a total of 13,090 AUMs.		
	Continue implementation of three HMPs for wildlife.		
	Implement range improvements as specified in Summary Table 2.		
B (Proposed RMP)	Initially authorize livestock use at the current use level of 36,962. No change in active preference.	No wilderness study areas would be recommended as suitable.	Identify for potential disposal 26,000 acres which meet preliminary disposal criteria.
	Implement new AMPs on seven Category I allotments and continue implementation of current AMPs on one Category I allotment and four Category C allotments.	Designate all of the 13,395 acres in the Burbank Canyon WSA as a Scenic Area. Limit ORVs in the area to existing roads and trails.	Designate rights-of-way corridors and identify planning corridors totaling 341 miles.
	Implement a rangeland and watershed monitoring program to determine if adjustments in grazing use are necessary.	Designate the 16,000 acres in the Stewart Valley fossil site as an ACEC.	
	Initially manage wild horses and burros at a level of 953 horses and 129 burros, a 25	Withdraw 1420 acres from mineral entry within the Stewart Valley ACEC. This has been expanded from 1280 acres proposed in the Draft.	

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Alternative	ISSUE: Range Management	Wilderness/ACECs	Land/Tenure Rights-of-Way Corridors
	percent decrease from current levels. This is a decrease of 221 horses from the level proposed in the Draft. Designate about 68,000 acres as the Marietta National Wild Burro Range. Implement five new Herd Management Area Plans (HMAP) for wild horses and burros. Manage wildlife habitat for a long term goal of providing for reasonable numbers of mule deer, antelope, and bighorn sheep. This would amount to a total of 18,451 AUMs, an increase of 41 percent over current levels. Continue implementation of three HMPs for wildlife. Protect the riparian habitat along 10.7 miles of streams and around 27 riparian areas. Implement watershed management plans on two areas. Implement range improvements as specified in Summary Table 2.	Expand the East Walker River Scenic Area to 4300 acres. This is an increase from the Draft proposal to maintain the 3889 acre designation. ORV use would be limited to designated roads. Continue the segregation from mineral entry on 3587 acres along the East Walker River. (This is included in the expanded scenic area.)	
C	Initially authorize livestock use of 64,107 AUMs, this is 74 percent above current use levels. Develop AMPs on seven category I allotments and continue implementation of AMPs on one Category I allotment and seven Category C allotments. Implement a rangeland and watershed monitoring program to determine if adjustments in grazing use are necessary. Initially manage wild horses and burros at a level of 223 horses and 50 burros, a reduction of 81 percent from current levels.	Recommend 9970 acres of the Burbank Canyon WSA and 27,860 acres of the Gabbs Valley WSA as suitable for Wilderness designation. This amounts to 39 percent of the total acreage in the WSAs. No areas would be designated as ACECs.	Identify for potential disposal 46,000 acres which meet preliminary disposal criteria. Designate rights-of-way corridors and identify planning corridors totaling 547 miles.

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Alternative	ISSUE: Range Management	Wilderness/ACECs	Land Tenure Rights-of-Way Corridors
	Implement five HMAPs for wild horses and burros.		
	Maintain wildlife habitat for existing numbers of mule deer, antelope, and bighorn sheep, a total of 13,090 AUMs.		
	Continue implementation of three HMPs for wildlife.		
	Protect riparian habitat along four miles of stream and six riparian areas.		
	Implement range improvements as specified in Summary Table 2.		
D	Initially authorize livestock use at 24,564 AUMs, a 34 percent decrease from the current level.	Recommend 9970 acres of the Burbank Canyon WSA and 68,170 acres of the Gabbs Valley WSA as suitable for designation as wilderness. This amounts to 84 percent of the acreage in the WSA.	Identify for potential disposal 2700 acres which meet preliminary disposal criteria.
	Implement new AMPs on six Category I allotments and continue implementation of AMPs on four Category M allotments.		Designate 217 miles of rights-of-way corridors.
	Implement a rangeland and watershed monitoring program to determine if adjustments in grazing use are necessary.	Designate 16,000 acres in Stewart Valley fossil site as an ACEC and withdraw all the 16,000 acres from mineral entry.	
	Defer livestock grazing for three months during the spring.	Designate 4300 acres along East Walker River as an ACEC and withdraw from mineral entry.	
	Initially manage wild horses and burros at a level of 1740 horses and 194 burros, an increase of 34 percent.		
	Designate about 68,000 acres as the Marietta National Wild Burro Range.		
	Implement five new HMAPs for wild horses and burros.		
	Manage wildlife habitat to provide forage for reasonable		

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Alternative	ISSUE: Range Management	Wilderness/ACECs	Land/Tenure Rights-of-Way Corridors
	numbers of mule deer, antelope, and bighorn sheep. This would amount to a total of 18,451 AUMs, an increase of 41 percent over current levels.		
	Continue implementation of three HMPs for wildlife.		
	Protect riparian habitat on 13.7 miles of streams and 103 riparian areas.		
	Acquire through exchange 1,000 acres of mule deer winter range.		
	Develop watershed management plans for Corey Creek, Bodie Creek, Rough Creek and Cottonwood Creek watersheds.		
	Implement range improvements as specified in Summary Table 2.		
E	Eliminate all livestock grazing on public lands.	All of the 13,395 acres in Burbank Canyons WSA and 79,600 acres in the Gabbs Valley Range WSA would be recommended as suitable for designation as wilderness.	No land disposal areas would be established. Disposals would be handled on a case-by-case basis.
	Manage wild horse and burro numbers at a level of 117 horses and 129 burros, ten percent below current numbers.		No rights-of-way corridors would be established. Rights-of-way would be handled on a case-by-case basis.
	Manage wildlife habitat for reasonable numbers of mule deer, antelope, and bighorn sheep. This would amount to a total of 18,451 AUMs, an increase of 41 percent over current levels.	Designate 16,000 acres in Stewart Valley and 4,300 acres along the East Walker River as ACECs and withdraw from mineral entry.	

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SUMMARY TABLE 2

Rangeland Improvement Projects by Alternative[1/]

Livestock[2/]	Alternative A		Alternative B		Alternative C		Alternative D	
Wells (ea.)			2	$21,000	2	$21,000	1	$10,500
Pipelines (miles)			11	72,600	14.25	94,050	11	72,600
Water Tanks (ea.)			1	6,500	1	6,500		
Water Troughs (ea.)			14	4,200	19	5,700	10	3,000
Spring Development			8	8,000	12	12,000	6	6,000
Fences (miles)	29.5	$73,750	32	80,000	45	112,500	28.2	70,500
Cattle Guard (ea.)	6	18,000	5	15,000	7	21,000	4	12,000
Brush Control (ac.)			500	5,000	1000	10,000		
Reservoir (ea.)			1	7,500	2	15,000	1	7,500
Total Costs		$91,750		$219,800		$297,750		$182,100
Wild Horses/Burros[2/]								
Water Development (ea.)		3/	7	$35,000	3	$17,000	12	$55,000
Wildlife[2/]								
P/J Removal (ac.)[4/]			600	$ 0				
Guzzlers (ea.)	3	$9,000	3	9,000	3	$9,000	3	$9,000
Spring Protection (ea.)	6	1,200	27	5,400	6	1,200	107	19,500
Seedings (ac.)							300	16,200
Water Improvements (ea.)	5	250	11	550	5	250	57	2,850
Fisheries Protection (miles)	2	3,000	10.7	22,400	4.0	6,000	13.7	25,800
Total Costs		$13,450		$37,350		$16,450		$73,350
Watershed Erosion Control Structures (ea.)		3/	20	$10,000		3/	30	$15,000
GRAND TOTAL		$105,200		$302,150		$331,200		$325,450

1/ There are no proposed range improvements for Alternative E (No Livestock Grazing).
2/ These improvements will be designed to benefit all uses. The categories used here are only to indicate the primary benefitting use.
3/ No specific improvements are currently planned.
4/ Pinyon/Juniper removal would be accomplished through fuelwood harvest, therefore no cost is involved.

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SUMMARY TABLE 3

COMPARATIVE REVIEW OF THE ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES

Environmental Component	Alternative A	B (Preferred)	C	D	E
Soils					
Number of identified areas in which erosion problems would be reduced. (%)[1]	1 (13%)	6 (75%)	6 (75%)	5 (63%)	8 (100%)
Overall average sediment yield (tons/acre/year) (% change)[2]	1.4 (0%)	1.3 (-7%)	1.4 (0%)	1.4 (0%)	1.0 (-29%)
Vegetation					
Percent change in forage condition.[2]	-1%	+3%	+2%	+1%	+3%
Wildlife					
Mule deer forage use (AUMs) (% change).[2]	12,790 (0%)	17,531 (+37%)	12,790-17,531 (N/A)	17,531 (+37%)	17,531 (+ 37%)
Wild Horses and Burros					
Projected Population Level (% change)[2]	1,303 (-10%)	1,082 (-25%)	273 (-81%)	1,934 (+34%)	1,303 (-10%)
Recreation					
Change in visitor hours[3]	1,182	9,116	2,709-9,581	9,927	9,927
Acres with ORV restrictions (%)[4]	0 (0%)	29,395 (2%)	37,830 (2%)	98,440 (5%)	113,295 (6%)
Livestock					
Projected livestock use (AUMs) (% change)[2]	36,378 (-1.5%)	36,768 (-0.5%)	60,570 (+64%)	24,797 (-33%)	0 (-100%)

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Environmental Component	Alternative A	B (Preferred)	C	D	E
Mining					
Acres withdrawn from mineral entry (%) 5/	11,014 (0.6%)	12,434 (0.7%)	45,257 (2%)	105,867 (6%)	120,722 (6%)
Forest Products					
Annual allowable cut (cords) (% change) 2/	750 (0%)	733 (-2%)	700 (-7%)	700 (-7%)	700 (-7%)
Wilderness					
Acres Protected 6/	0 (0%)	0 (0%)	37,830 (41%)	78,140 (84%)	92,995 (100%)
ACECs/Scenic Areas					
Acres Protected (% change) 4/	3,889 (0.2%)	33,695 (2%)	3,889 (0.2%)	24,189 (1%)	24,189 (1%)
Lands					
Potential acres disposed (%) 4/	N/A	26,000 (1%)	46,000 (2%)	2,700 (0.1%)	N/A
Social and Economic Conditions					
Change in regional income (%) 2/	-$23,000 (0.01%)	+$8,000 (0%)	+$826,000 (0.4%)	-$360,000 (0.2%)	-$1.4 mil. (0.7%)

1/ Percent of identified soil erosion problem areas.
2/ Percent change from current levels.
3/ Percent change cannot be calculated due to lack of data.
4/ Percent of public land in the RMP area.
5/ Includes current withdrawals and proposed withdrawals in wilderness areas and ACECs.
6/ Percent of acres in Wilderness Study Areas.

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CHAPTER ONE

PURPOSE AND NEED

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CHAPTER ONE

THE PLANNING PROCESS

This document is intended to be used in conjunction with the Draft Walker Resource Management Plan and Environmental Impact Statement (RMP/EIS). This document contains the proposed resource management plan; public comment on the Draft; Bureau responses to these comments; and revisions, additions, and errata to the Draft RMP/EIS. Since the changes in the Draft were minimal, it was not deemed necessary to reprint the entire document, pursuant to Council on Environmental Quality Regulations (40 CFR 1503.4(b)).

PURPOSE AND NEED

The purpose of this document is to present the proposed resource management plan for the Walker Resource Area. It is prepared pursuant to Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) which requires that the Secretary of the Interior shall, with public involvement, develop land use plans which provide for the use of public lands. The National Environmental Policy Act of 1969 (NEPA) requires federal agencies to prepare statements documenting the environmental consequences of federal actions significantly affecting the human environment. Resource management plans (RMPs) fall under this category, and therefore, an environmental impact statement is required.

The Walker Resource Management Plan is being prepared to provide a comprehensive framework for future management of public lands in the Walker Resource Area.

The Walker Resource Area consists of the Pine Nut, Markleeville, Mina and Walker Planning Units. This RMP covers all of these units, however, land use decisions for the Pine Nut and Markleeville units were issued in 1983 as part of the Reno Management Framework Plan (MFP). Therefore, the planning area referred to in this document will be limited to the Mina and Walker units. Decisions in the Reno MFP are incorporated by reference in this RMP.

The Walker Planning Area encompasses about 1.9 million acres of public land. Seventy-nine percent of the total (1.5 million acres) is located in Mineral County, eighteen percent (340,000 acres) is located in Lyon County, and four percent (70,000 acres) is located in Douglas County (Resource Management Plan Area Map).

This RMP does not provide final implementation decisions for actions which require further site-specific plans and environmental analyses, such as public land sales, right-of-way grants, and Allotment Management Plans. Furthermore, it does not provide a final decision for designation of Wilderness since congressional action is required. It is prepared with an interdisciplinary approach designed, "to achieve integrated consideration of physical, biological, economic and other sciences" (FLPMA, Sec. 202(c)(2)).

In addition to meeting the planning needs for the Walker Planning Area, the RMP/EIS also fulfills other specific objectives. It analyzes alternatives for livestock grazing on public land as required under a court ordered agreement based on a 1973 lawsuit brought against the BLM by the Natural Resources Defense Council. The RMP also includes the evaluation of two Wilderness Study

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Areas (WSAs) as required by Section 603 of the Federal Land Policy and Management Act (FLPMA).

In accordance with BLM policy, the following procedure has been used in addressing environmental concerns pertaining to wilderness designation. Environmental impacts of wilderness designation have been incorporated into the Bureau planning process through the Draft RMP stage. The Draft presents the impacts to wilderness and other resources by alternative in summary form. Comments received on wilderness from the Draft will be presented in the Final Walker Resource Area Wilderness EIS, to be published as a separate document from the Walker Final RMP. The Wilderness EIS will be submitted through the BLM Director and Secretary of the Interior to the President. The recommendations contained in the final wilderness EIS will be preliminary and are subject to change during administrative review. Specific information on the wilderness areas is included in the Walker Wilderness Technical Report, which is available upon request for those who desire more information. Appendix F of the Draft RMP presents the BLM Wilderness Review Process consisting of inventory, wilderness study, and reporting channels to Congress.

PLANNING PROCESS OVERVIEW

The resource management planning process is described in detail in BLM planning regulations (32 CFR part 1600). It consists of the nine planning steps outlined below and in Figure 1-1.

Step 1. Identification of Issues

This step is intended to identify resource management problems or conflicts that can be resolved through the planning process.

Step 2. Development of Planning Criteria

During this step criteria regarding the kinds of information needed to clarify the issues, the kinds of alternatives to be developed, and the factors to be considered in evaluating alternatives and selecting a preferred resource management plan are developed.

Step 3. Inventory Data and Information Collection

This step involves the collection of various kinds of issue-related resource, environmental, social, economic, or institutional data needed for completion of the planning process.

Step 4. Analysis of the Management Situation

This step calls for a deliberate assessment of the current situation. It includes a description of current BLM management, a discussion of existing problems and opportunities for solving them, and a consolidation of existing data that is needed to analyze and resolve the identified issues.

Step 5. Formulation of Alternatives

During this step several complete, reasonable resource management alternatives are prepared, including one for no action and several that strive to resolve

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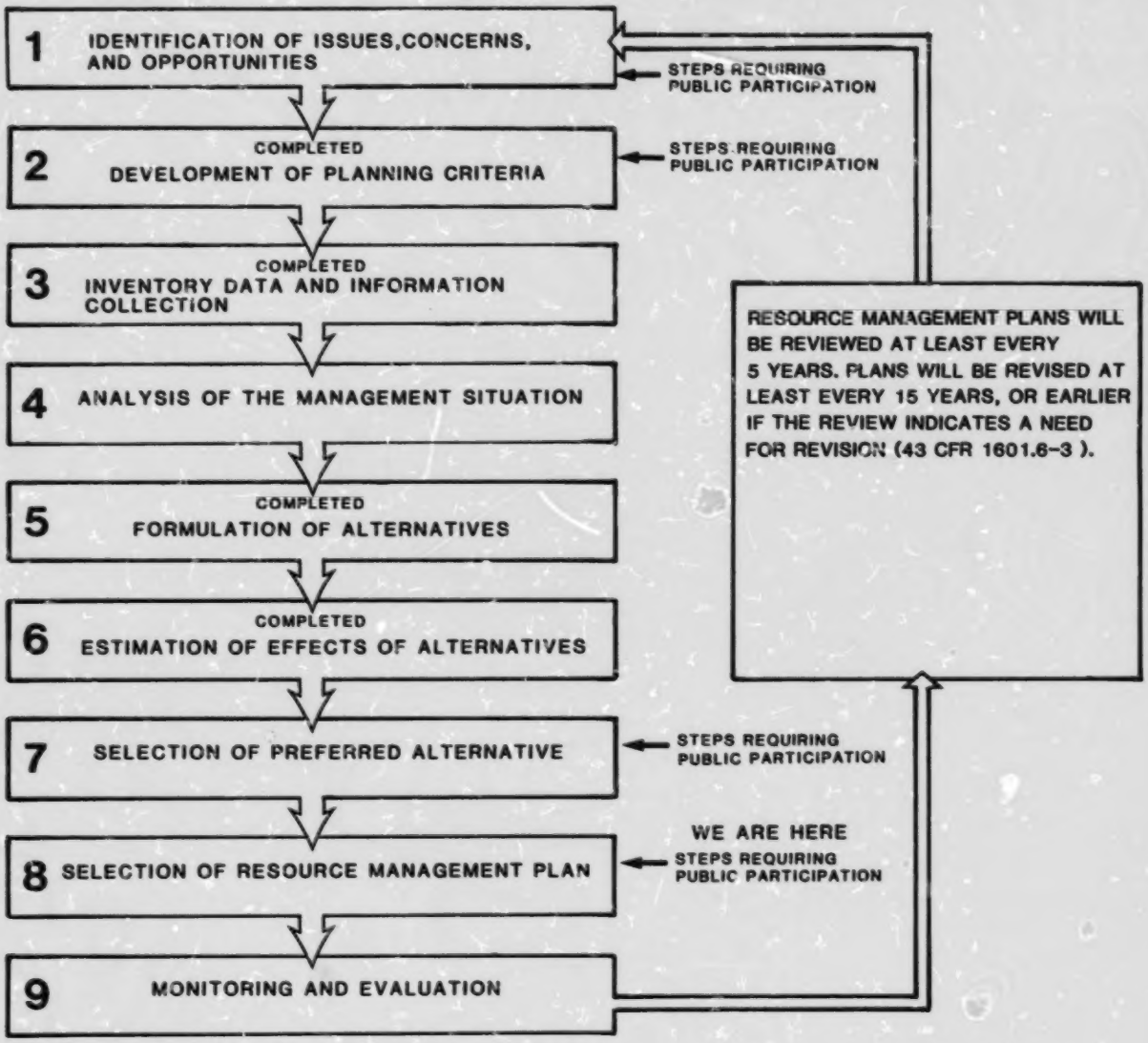
FIGURE 1-1

STEPS IN THE RESOURCE MANAGEMENT PLANNING PROCESS


1 IDENTIFICATION OF ISSUES, CONCERNS, AND OPPORTUNITIES
STEPS REQUIRING PUBLIC PARTICIPATION
COMPLETED
2 DEVELOPMENT OF PLANNING CRITERIA
STEPS REQUIRING PUBLIC PARTICIPATION
COMPLETED
3 INVENTORY DATA AND INFORMATION COLLECTION
4 ANALYSIS OF THE MANAGEMENT SITUATION
COMPLETED
5 FORMULATION OF ALTERNATIVES
COMPLETED
6 ESTIMATION OF EFFECTS OF ALTERNATIVES
7 SELECTION OF PREFERRED ALTERNATIVE
STEPS REQUIRING PUBLIC PARTICIPATION
WE ARE HERE
8 SELECTION OF RESOURCE MANAGEMENT PLAN
STEPS REQUIRING PUBLIC PARTICIPATION
9 MONITORING AND EVALUATION
RESOURCE MANAGEMENT PLANS WILL BE REVIEWED AT LEAST EVERY 5 YEARS. PLANS WILL BE REVISED AT LEAST EVERY 15 YEARS, OR EARLIER IF THE REVIEW INDICATES A NEED FOR REVISION (43 CFR 1601.6-3).

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the issues while placing emphasis either on environmental protection or resource production.

Step 6. Estimation of Effects of Alternatives

The physical, biological, economic, and social effects of implementing each alternative are estimated in order to allow for a comparative evaluation of impacts.

Step 7. Selection of the Preferred Alternative

Based on the information generated during Step 6, the District Manager identifies a preferred alternative. The Draft RMP/EIS document is then prepared and distributed for public review.

Step 8. Selection of the Resource Management Plan

Based on the results of public review and comment, the District Manager will select a Proposed Resource Management Plan and publish it along with a final EIS. A final decision is made after a thirty-day appeal period on the final EIS.

Step 9. Monitoring and Evaluation

This step involves the collection and analysis of long-term resource condition and trend data to determine the effectiveness of the plan in resolving the identified issues; and to assure that implementation of the plan is achieving the desired results.

Monitoring continues from the time the RMP is adopted until changing conditions require a revision of the whole plan or any portion of it.

For the Walker RMP process, steps one through eight have been completed with Selection of the Resource Management Plan which is part of this document.

PLANNING ISSUES

The BLM planning process is focused on significant resource management problems and conflicts through the use of issue identification. Issues to be addressed in the plan are identified from attitudes, opinions, and beliefs expressed by the public; interest groups; public land users; and other federal, state, and local government agencies as well as BLM staff and managers. The issue identification process for the Walker RMP resulted in the development of the following issues:

Issue One: Rangeland Management

This issue involves the use of the soil and vegetation resource on public rangelands. Although soil erosion rates in the planning area are generally within acceptable levels, several creeks and rivers have channel and lateral bank erosion problems and several flats have potential wind erosion problems. Although the trend in forage condition is generally stable, competition for forage among livestock, wild horses, burros, and wildlife occurs in portions of the planning area. Studies indicate that eight percent of the area's

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vegetation is being severely used by grazing animals. Much of the heavy use occurs in areas of riparian vegetation around springs and along creeks and rivers.

These areas include critical habitat for many wildlife species. In parts of the planning area, grazing during the critical spring growth period limits plant vigor.

Issue Two: Wilderness

This issue involves the amount of acreage in two WSAs to be recommended as suitable for wilderness designation and included in the National Wilderness Preservation System (NWPS) or recommended as nonsuitable and returned to multiple use or another land use category. These WSAs are: Burbank Canyons (13,395 acres) and Gabbs Valley Range (79,600 acres). Primary considerations include the protection of wilderness and scenic values, the manageability of the areas as wilderness, and the value of the mineral resources in the areas.

Issue Three: Land Tenure and Rights-of-Way Corridors

This issue involves the identification of lands with the potential for transfer to state and local governments or the private sector.

This issue also includes the designation of rights-of-way corridors containing existing facilities; and identification of planning corridors for potential future facilities. Such corridors would be primarily intended for major power transmission lines. Corridors are intended to minimize the proliferation of dispersed rights-of-way by indicating the Bureau's preferred location.

OTHER PLANNING FACTORS

The RMP also considers the designation of two areas as Areas of Critical Environmental Concern (ACECs). These are: Stewart Valley, an area of paleontological resources (fossils) with worldwide significance; and the East Walker River, an area of high recreational, scenic, cultural, and wildlife values.

Off-road vehicle (ORV) use was not considered an issue. Off-road vehicle problems are minimal and are not expected to increase. Closed or limited ORV designations are proposed in management actions related to the issues discussed in the RMP.

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CHAPTER TWO

THE PROPOSED RESOURCE MANAGEMENT PLAN

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CHAPTER TWO

THE PROPOSED RESOURCE MANAGEMENT PLAN

The Proposed Resource Management Plan emphasizes a balanced approach to land management for the Walker Planning Area. It is the result of a detailed analytical process which began in March, 1983, with the Issue Identification phase. Public involvement has been included throughout the process.

The plan provides for protection and enhancement of the natural environment while not overly restricting the production of commercial resources from the public lands. It is similar to the preferred alternative in the Draft RMP, with the following changes: 1) The Scenic Area designation for the East Walker River would be expanded from 3889 acres to 4300 acres. Off-road vehicles would be limited to designated roads within the Scenic Area. The expansion of the Scenic Area and the ORV limitation would provide additional protection to the East Walker River scenic corridors; 2) The proposed withdrawal from mineral entry in the Stewart Valley area has been expanded from 1280 acres to 1420 acres to provide additional protection to key paleontological resources; and 3) The number of wild horses in the Garfield Flat allotment has been reduced to attain a management level of 364 head. This reduction was implemented based on data obtained since the Draft RMP/EIS was prepared.

The following sections outline the management actions and procedures for the issues covered in this document: Rangeland Management, Wilderness, and Land Tenure and Rights-of-Way Corridors. Also included, but not treated as an issue were Areas of Critical Environmental Concern.

ISSUE: RANGELAND MANAGEMENT

Objectives

Maintain or improve the condition of the public rangelands and watersheds so as to enhance productivity for all rangeland and watershed values.

Initially, manage livestock use at existing levels.

Initially, manage for wild horses and their habitat in herd areas at current population levels, or at a level identified in an approved activity plan.

Manage wildlife habitat to achieve a long term goal of reasonable numbers of big game.

Protect and maintain existing and potential fisheries habitat and riparian habitat in a good or better condition.

Management Actions

1. Initially, authorize livestock use at the three-year average licensed use level of 36,962 AUMs. There would be no change in active preference.

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2. Develop and implement AMPs on seven Category I allotments, and continue implementation of existing AMPs on one Category I and four Category M allotments to improve and/or maintain condition; provide for proper utilization within key areas; achieve better livestock distribution to obtain more uniform utilization; and provide an increase in available forage and water for livestock, wild horses, and wildlife.

3. Install the following range improvements (Table 2-1) within the first five years of implementation to achieve management objectives. These range improvements would consist of:

a. The development of water facilities and systems which would include drilling two wells, laying 11 miles of water pipeline, installing one water storage tank and 14 water troughs, and developing eight spring sources and one reservoir.

b. Construction of 32 miles of fence and installation of five cattle guards.

c. Brush control on 500 acres.

4. Initially manage wild horses and burros in current herd areas at present estimated population levels, except in the following areas: 1) Pine Nut Herd Area, the entire population of this area was identified for removal in the Reno Management Framework Plan; 2) Powell Mountain Herd Area, this area has an existing management plan which specifies the population level; and 3) Garfield Flat Herd Area, the population level in this area will initially be managed as specified in the 1984 Garfield Flat Capture Plan. The implementation of these plans would yield a level of 953 horses and 129 burros.

5. An area of about 68,000 acres near Marietta is being proposed for designation as the Marietta National Wild Burro Range.

6. Develop and implement five Herd Management Area Plans (HMAPs) for wild horses and burros. This would include the development of seven water sources (Table 2-1).

7. Manage wildlife habitat for a long term goal of providing forage for reasonable numbers of big game including: 18,087 AUMs for mule deer, 268 AUMs for antelope, and 96 AUMs for bighorn sheep; while recognizing an initial forage demand of 12,790 AUMs for mule deer, 247 AUMs for antelope, and 53 AUMs for bighorn sheep.

8. Continue implementation of the Alkali Lake, East Walker River, and Pilot Mountain Habitat Management Plans (HMPs) for wildlife.

9. Support reintroductions of Lahontan cutthroat trout, bighorn sheep, and other endemic species into suitable habitats.

10. Implement range improvement projects to protect and improve big game, sage grouse, fisheries, and riparian habitat. This includes protection of 10.7 miles along fishable rivers and creeks; rehabilitation of meadow habitat in the McBride Flat allotment; protection of 20 developed spring sources and seven undeveloped riparian areas; removal of 600 acres of pinyon-juniper overstory on selected sites in the Pine Nut Mountains, Excelsior Mountains, Wassuk Range, and the McBride Flat area through fuelwood harvest; installation

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TABLE 2-1

POTENTIAL RANGELAND IMPROVEMENT PROJECTS

Livestock[1/]		
Wells (ea.)	2	$21,000
Pipelines (miles)	11	72,600
Water Tanks (ea.)	1	6,500
Water Troughs (ea.)	14	4,200
Spring Development	8	8,000
Fences (miles)	32	80,000
Cattle Guard (ea.)	5	15,000
Brush Control (ac.)	500	5,000
Reservoir (ea.)	1	7,500
Total Costs		$219,800
Wild Horses/Burros[1/]		
Water Development (ea.)	7	$35,000
Wildlife[1/]		
P/J Removal (ac.)[2/]	600	$ 0
Guzzlers (ea.)	3	9,000
Spring Protection (ea.)	27	5,400
Water Improvements (ea.)	11	550
Fisheries Protection (miles))	10.7	22,400
Total Costs		$37,350
Watershed		
Erosion Control Structures (ea.)	20	$10,000
Total Costs		$302,150

1/ These improvements will be designed to benefit all uses. The categories used here are only to indicate the primary benefitting use.

2/ Pinyon/Juniper removal would be accomplished through fuelwood harvest therefore no cost is involved.

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of three guzzlers; and provision of water for wildlife at six spring developments and five undeveloped riparian areas (Table 2-1).

11. Acquire lands along the East Walker River through exchange to enhance wildlife habitat management.

12. Develop and implement Watershed Management Plans (WMPs) on Corey Creek and Rough Creek watersheds. Twenty erosion control structures would be required to implement these plans (Table 2-1).

13. Continue rangeland and watershed monitoring to determine if management objectives are being met and what future adjustments in grazing use are necessary.

ISSUE: WILDERNESS

Objective

Manage as wilderness only those areas for which wilderness values are higher than other values and which have no existing or potential manageability problems.

Management Actions

1. Neither of the WSAs would be recommended as suitable for wilderness designation.

2. Burbank Canyons: The entire 13,395 acres would be designated as a Scenic Area. The Scenic Area would be closed to ORV use except on designated existing roads (Special Designation Areas Map).

3. Gabbs Valley Range: Manage the 79,600 acres in the Gabbs Valley Range WSA not recommended as suitable for wilderness designation as outlined in the Implementation section of this chapter.

WSA Name	Suitable Acres Acres	Nonsuitable Acres
Burbank Canyons NV-030-525a	0	13,395 acres
Gabbs Valley Range NV-030-407	0	79,600 acres
	0 (0%)	92,995 acres (100%)

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ISSUE: LAND TENURE AND RIGHTS-OF-WAY CORRIDORS

Objectives

Transfer lands out of federal ownership that are uneconomical to manage or have been identified for community expansion or agricultural development and have little value for other resource uses.

Provide utility companies with specific area designations within which they could establish an east-west and north-south network of rights-of-ways.

Concentrate adverse impacts to the environment by locating compatible rights-of-way in designated corridors.

Management Actions

1. Designate for potential future disposal approximately 26,000 acres as a pool of lands which meet preliminary criteria for transfer from federal ownership. These are lands that are difficult and uneconomic to manage because of location and other characteristics (e.g.; scattered parcels south of Hawthorne and in Smith and Mason Valleys); lands that would support community expansion (e.g.; lands west of Yerington, in Mason Valley, surrounding the towns of Luning, Mina, and Sodaville, and land east of Montgomery Pass); land with possible agricultural potential in Mason and Smith Valleys; and lands along the East Walker River identified for exchange to benefit Bureau programs.

2. Designate 217 miles of rights-of-way corridors which include existing transmission lines, and identify 124 miles of planning corridors as shown on the Corridor Map. All corridors are two miles in width. Private lands are not included in these corridors.

The corridors are:

a. A-C, a right-of-way corridor, containing a major powerline from the Fort Churchill Power Plant to the South Lake Tahoe area. Another major powerline is planned along this route to South Lake Tahoe and west over the Sierra Mountains.

b. D-M-H, a right-of-way corridor following the existing major powerline from Bonneville to Los Angeles. Another major powerline is being planned for this route.

c. C-N-F, a right-of-way corridor following the existing major powerline from the Fort Churchill Power Plant to southern Nevada. Portions of this route also contain U.S. Highway 95, a railroad, telephone and other powerlines.

d. E-N-G, a right-of-way corridor following the existing Western Area Power Administration right-of-way. The existing right-of-way is the eastern boundary of this corridor. While it does not contain a powerline, a major powerline from Bonneville to southern Nevada and California is planned for this route.

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Stewart Valley Paleontological Area, proposed for designation as an ACEC.

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e. I-J-O-K, a planning corridor for a powerline between Austin and the Los Angeles area. A portion of this route borders U.S. Highway 6 and contains telephone and secondary powerlines. It may be considered for power transmission to southern California from Dixie Valley.

f. M-N, a planning corridor connecting powerline corridors D-M-H, E-N-G, and C-N-F. It is planned for use in the event that environmental constraints prevent a powerline parallel to the line in corridor D-M-H in California.

g. E-K, a planning corridor following a proposed route from Dixie Valley through Montgomery Pass to Bishop.

h. D-L, a planning corridor for a potential major gas pipeline to the west coast. A portion of the route follows an existing powerline corridor route.

i. B-C, a right-of-way corridor following the existing major powerline from the Fort Churchill Power Plant to Reno and Carson City.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

Objective

Provide protection and enhancement of natural and scientific values at Stewart Valley and the East Walker River; while allowing public use and enjoyment, and other resources uses.

Management Actions

1. Designate 16,000 acres in Stewart Valley as an ACEC, and withdraw 1,420 of those acres from mineral entry.

2. Limit off-road vehicle use in the Stewart Valley ACEC to designated roads, trails, and washes.

3. Manage the Stewart Valley ACEC as a Research Natural Area. Establish special rules and permits for scientific research and field schools. No commercial collection would be allowed.

4. Expand the East Walker River Scenic Area from 3889 acres to 4300 acres.

5. Manage the East Walker River Scenic Area as a Class II Visual Resource Management Zone, where management actions can be evident but should not detract from the scenic quality of the area. Off-road vehicle use would be limited to designated roads.

IMPLEMENTATION OF THE RESOURCE MANAGEMENT PLAN

The resource management plan will generally be implemented through activity plans. These are detailed, site-specific management actions outlined in livestock AMPs, wildlife HMPs, wild horse HMAPs, and wilderness management

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plans among others. These plans are multiple-use in nature, and include such actions as range improvements and grazing systems. Monitoring will be used to ensure that plans meet objectives.

Rangeland Program Summary

A Rangeland Program Summary (RPS) will be issued within five months of the completion date of the RMP. The RPS will inform livestock permittees and interested publics about the implementation of the rangeland management program. The RPS will identify allotment specific objectives for livestock, wild horses and burros, and wildlife. It outlines specific monitoring studies necessary to evaluate the attainment of objectives and the range improvements proposed to implement the RMP.

The Selective Management Policy

It is the policy of the BLM to address rangeland management problems through a selective management approach. This approach assigns management priorities among allotments within a planning area. This is based on identifying allotments with similar management needs, resource characteristics, and potential for improvement in both resource and economic returns.

The similarity among the allotments allows them to be grouped into three categories with each having its own objective. The three categories and their objectives are: Maintain current satisfactory condition; Improve current unsatisfactory condition; or manage the allotments Custodially, while protecting existing resources. The use of these allotment categories will help to establish priorities for distributing available funds and personnel in such a way as to achieve cost effective improvement of rangeland production and condition. These funds will be used to develop grazing treatments and systems and install range improvements in order to resolve grazing related problems. The priorities identify those allotments where more intensive management is needed.

Allotments have been placed in the (M) Maintenance, (I) Improvement, and (C) Custodial categories using the criteria outlined in Appendix D of the Draft RMP.

Allotment Management Plans

Allotment management plans would be developed for all Category I allotments, and Category M and C allotments as needed. These plans would be multiple-use in nature. They would be developed in consultation with interested parties and coordinated with wildlife, wild horse and burro, watershed, and wilderness plans. Key components of AMPs are allotment specific objectives, monitoring studies, grazing systems, range improvements, and evaluations.

Grazing Treatments and Systems

A grazing treatment describes the level of grazing use and periods-of-use for a unit (usually a pasture) of an allotment, or an entire allotment in one or more years. Grazing treatments are the building blocks of the grazing plan, and are designed to improve rangeland condition by manipulating livestock grazing to accomplish objectives of management. The deferment of grazing or

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complete rest from grazing during the critical growth period of key management species would allow these species to maintain and/or increase their density, composition, vigor, production, and reproduction. The following rest treatments (singly or in various combinations) would be combined with scheduled grazing treatments to form grazing systems in AMPs for specific allotments.

Treatment 1: Rest from livestock grazing for two consecutive growing seasons (approximately April 1 of one year to August 31 of the following year).

Two growing seasons of rest would allow key management species to improve vigor, increase litter accumulation, seed production, and seedling establishment. Rest for two growing seasons is required in order for grass seedlings to develop adequate root growth to withstand appreciable grazing and trampling (Hormay, 1970).

Treatment 2: Livestock grazing from midsummer to fall (approximately July 16 to November 15 -- dates vary with allotments).

Grazing after seed-ripe would provide better seed dispersal and trampling. When coupled with other treatments that provide for spring rest the following year, this treatment would allow an improvement in plant vigor and seedling establishment for key grass species and many shrubs.

Treatment 3: Provide rest from livestock grazing for two years, until seedlings are established or until it is determined that a vegetation manipulation or recovery project is unsuccessful.

This treatment provides the protection necessary for establishment or recovery of key management species following wildlife seeding, burning, or herbicide spraying projects.

Treatment 4: Defer livestock grazing from early spring to midsummer each year (approximately April 1 to June 30).

This treatment may be required yearly and could be retained until the systems are implemented. Improved vigor and reproduction of key management species in each allotment would result.

Where intensive grazing management systems are implemented, utilization levels may be exceeded during each grazing cycle. The periodic rest from grazing would allow the key management species to increase in vigor and production.

Treatment 5: For key deer winter range where bitterbrush is the key species, a special grazing treatment is recommended.

This requires two years of rest, followed by one year of grazing after seed-ripe and finally one year of season-long grazing. Variations of this treatment are acceptable as long as they include the two-year rest period required for bitterbrush seed production.

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Range Improvements

Range improvements will be developed to meet identified management objectives. Fencing and water developments improve livestock distribution, especially when developed in conjunction with a grazing management plan. Table 2-1 identifies potential range improvements and their costs.

Wildlife Habitat Management Plans

Wildlife habitat improvement projects would be guided, for the most part, by habitat management plans. The plans would be developed through consultation with interested parties and would be coordinated with livestock, wild horse, and wilderness plans. These plans would be focused on rehabilitation and improvement of wildlife habitat through protective fencing, water developments, grazing management, and vegetation treatments.

Riparian and fisheries habitat protection measures would involve primarily fencing of the area to prevent overutilization and trampling. Some grazing use by livestock and wild horses could occur on those riparian areas where monitoring studies indicate the area has recovered to a good or better condition class. The degree and season of grazing use will be determined through consultation and coordination with affected livestock permittees and other interested parties.

Wild Horse Herd Management Area Plans

Wild horse and burro management in specific areas would be guided by HMAPs. The plans would be developed through consultation with interested parties and would be coordinated with livestock, wildlife, and watershed plans. They would be focused on wild horse and burro management through maintaining or improving wild horse and burro populations and habitat, development of water sources, and population and habitat monitoring studies. The U.S. Forest Service (USFS) has been designated lead management responsibilities for wild horses in the Powell Mountain and Montgomery Pass Wild Horse Herd Areas. The USFS has prepared a management plan for the Powell Mountain Wild Horse Territory (USFS term) which sets the wild horse population management level at 29. They are in the process of preparing a management plan for the Montgomery Pass Wild Horse Territory, which may require adjustments in that population.

Wild Burro Range

Designated Wild Horse or Burro Ranges are devoted primarily to the protection and preservation of wild horses or burros. This means, that other uses must be constrained to the extent necessary to provide fully for their welfare. This could require reductions or closure to livestock grazing, although in the case of the Marietta Herd Area, current livestock/wild burro use areas overlap only slightly.

Designation of wild horse and burro ranges is reserved to the Director of the Bureau of Land Management. Following approval of this land use plan, the recommendation for designation of the Marietta National Wild Burro Range would be forwarded to the Director for his action.

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Watershed Management Plans

The watershed management plans would be developed through consultation with interested parties and would be coordinated with livestock, wildlife, and wild horse and burro management plans. After the plans have been implemented, the watershed conditions will be monitored through the water quality and wind and water erosion studies. If necessary, changes in the future watershed treatments will be proposed.

Resource Monitoring

Future adjustments in livestock and wild horses will be based on consultation with interested parties and an analysis of data from monitoring studies. This involves the use of vegetation study techniques to measure ecological status and trend, grazing utilization and distribution, actual use information, and climatic data.

Category I allotments have the greatest number of resource conflicts and potential for improvement. Therefore, more intensive range monitoring efforts, including frequency transects (1981 Nevada Range Monitoring Procedures), key area utilization, ecological status, use pattern mapping, actual use, and precipitation studies will be implemented or continued in these allotments to determine whether management objectives are being met with proposed management and treatments. Management and/or grazing use levels may be changed based upon the results of these studies.

Few changes in management or treatments are anticipated for Category M and C allotments. Therefore, less intensive range monitoring efforts, including utilization, actual use, precipitation, and perhaps a few frequency studies within selected key areas will be implemented or continued to determine whether current conditions are being maintained, and existing resources protected with present management.

Wilderness

The wilderness study areas would continue to be managed under the Bureau's Interim Management Policy until completion of the wilderness review process. A separate wilderness final environmental impact statement will be prepared and filed by the Secretary of Interior. Recommendations made in the final wilderness environmental impact statement are subject to change during administrative review. The wilderness technical report describing both of the WSAs in detail provides additional information to support these documents.

Those areas determined to be suitable would be recommended to Congress for designation. Those areas determined to be nonsuitable would be recommended to Congress for elimination from wilderness consideration.

Designated wilderness areas would be closed to off-road vehicle use unless it takes place as part of a valid existing right or is authorized in the wilderness management plan. Separate management plans tailored to the characteristics of each area would be developed through consultation with interested parties, and would be coordinated with other activity plans. Specific management objectives, requirements, and decisions implementing administrative practices and visitor activities would be developed in each

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plan. Designated wilderness areas would be segregated against appropriation and operations under the mining laws, mineral leasing laws, and other mineral disposal authorities subject to valid existing rights. Designation would allow for continuation of livestock grazing permits.

Scenic Areas

Scenic areas are established to identify areas of outstanding visual quality. Scenic areas shall be managed to protect and enhance scenic qualities while allowing the maximum amount of recreation use possible. These lands are managed within Class II Visual Resource Management Objectives where management actions may be seen but should not attract the attention of the casual observer. The level of change to the characteristic landscape would be low.

Areas of Critical Environmental Concern

Designation of an area as an Area of Critical Environmental Concern (ACEC) does not by itself preclude any activities allowed under the public land laws. The ACEC designation is a recognition of the special resources of an area and a commitment to provide management which protects and/or enhances that area. No action that is inconsistent with the terms of an ACEC designation or that would adversely impact an ACEC protected resource will be permitted, unless it is found through the plan amendment process that the public benefits of such an action outweigh the public benefits of continuing the ACEC protection and that there is no feasible alternative to the proposed inconsistent action. Protection of the ACEC is accomplished through management actions developed specifically for each individual area.

Land Tenure

This plan does not propose any acreage for immediate sale to the private sector. It identifies a pool of lands with the potential for future transfer to state and local governments, as well as to the private sector. Preliminary analysis indicates those tracts of public land identified meet the disposal criteria outlined in Section 203 of FLPMA.

These are lands that are difficult or uneconomic to manage; are not suitable for management by another federal agency; were acquired for a purpose which is no longer required, or would serve an important public objective (i.e.; community development, economic development, etc.) which cannot be obtained otherwise and outweigh other public values (i.e.; recreation and scenic values).

The methods for transferring these lands include lease and sale under the Recreation and Public Purposes Act, and lease, sale, or exchange under FLPMA.

Any land sales would be subject to the provisions of Section 203 of FLPMA, which mandate a detailed analysis of each specific disposal. This analysis includes preparation of an environmental assessment, a cultural resources clearance, a report on mineral values, and an appraisal to establish fair market value. Tracts that this analysis indicates are not suitable for disposal would be retained. If the analysis indicates that a tract is suitable for disposal, a Notice of Realty Action would be distributed to interested parties, including local governments. This notice is published

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with a right of protest. A final decision would occur upon completion of the protest period.

Exchanges and minor non-Bureau initiated realty proposals would be considered where analysis indicates they are beneficial to the public.

Rights-of-Way Corridors

The designation of rights-of-way corridors is intended to minimize the proliferation of dispersed rights-of-way by indicating the Bureau's preferred location. Designation does not mean that future rights-of-way are restricted to corridors, nor is it a commitment by the Bureau to approve all rights-of-way applications within corridors - a corridor is not a withdrawal.

Corridor management involves encouraging prospective applicants to locate within corridors. This may limit other activities within corridors which are not compatible with rights-of-way use. Land disposals within corridors will be analyzed for their impact on future right-of-way activities.

All applications for right-of-way grants, whether or not they are within designated corridors, are subject to standard approval procedures as outlined in the right-of-way regulations (43 CFR 2802). These procedures include: 1) Preparation of an environmental analysis in accordance with the National Environmental Policy Act (NEPA) of 1969; 2) A determination of compliance of the applicant's proposed plans with applicable federal and state laws; 3) Consultation with federal, state, and local agencies; and 4) Any other action necessary to fully evaluate and make a decision to approve or deny the application and prescribe suitable terms and conditions for the grant or permit. Consultation and coordination with the public, including adjacent landowners, will occur throughout the process.

Corridors provide for a variety of right-of-way uses including powerlines, pipelines, railroads and highways. The major use expected in the planning area is powerlines.

PLAN MONITORING

Monitoring will include not only the resource monitoring described above, but also monitoring of the RMP itself. At intervals not to exceed five years, the management actions will be analyzed for consistency with plans adopted by local, state, and other federal agencies and Indian tribes; new data will be analyzed to determine its significance to the plan.

Monitoring activities include plan maintenance. This involves posting new information and refining the analysis. Maintenance does not extend the scope or level of resource uses, or change uses or restrictions from that prescribed in the approved RMP.

Future proposals or actions that are not in conformance with the RMP, but which warrant further consideration prior to a complete plan revision, will be considered through the plan amendment process. These amendments generally follow the same process as the RMP but are limited to one or two issues and do not require preparation of an EIS if impacts are insignificant.

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The RMP will be completely revised when plan monitoring indicates that maintenance of the plan and amendments to the plan are inadequate to keep the plan current with changing circumstances, resource conditions, or policies. All the requirements for preparing and approving an original RMP are followed.

SUPPORT REQUIREMENTS

Support requirements such as cadastral survey, engineering design, additional inventories, etc., will be determined during the activity planning phase of this RMP when more specific proposals are available.

CONSISTENCY DETERMINATIONS

As part of the Management Situation Analysis the policies, plans, and programs of other federal agencies, state and local governments, and Indian tribes were reviewed. No conflicts between those policies, plans, or programs and the proposed RMP have been identified by BLM staff. Federal agencies, state and local governments, and Indian tribes have been given the opportunity to identify any conflicts during the public review process as outlined in Chapter Five of the Draft RMP/EIS.

STANDARD OPERATING PROCEDURES

Certain requirements are inherent in the implementation of any Bureau action on the public lands. These requirements, or standard operating procedures, are designed to mitigate impacts and would be followed during implementation of the proposed action.

1. An environmental review (i.e,; environmental assessment) will be prepared before projects are developed except when they are covered by a categorical exclusion so that, depending on impact, implementation, modification, or abandonment of the project may be considered.

2. Cultural resource protection requires compliance with Section 106 of the National Historic Preservation Act of 1966, Section 101(b)(4) of NEPA of 1969, the Historic Preservation regulations (36 CFR 800) and the Native American Indian Religious Freedom Act of 1970. Prior to project approval, appropriate field inventories will be conducted, including Class III inventories, in specific areas that would be impacted by implementing activities. If cultural or paleontological sites are found, every effort will be made to avoid adverse impacts. However, where that is not possible, the BLM will consult with the State Historic Preservation Officer.

3. Any project which has a visual contrast rating that exceeds the recommended maximum for the visual class zone in which it is proposed, the visual contrasts are considered significant and mitigating measures must be examined. The ultimate decision in these cases of whether a particular projects's visual impact is positive or negative, acceptable or unacceptable,

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and whether mitigating measures must be implemented, rests with the District Manager and must be made on a project-by-project basis.

4. Air quality will be protected as all Bureau and Bureau-authorized activities must be designed to prevent air quality deterioration beyond the established standards specified in the Nevada Ambient Air Quality Standards. The Federal Land Policy and Management Act of 1976 specifies the protection of air and atmospheric quality on BLM lands in Sec. 102(a)(8), and compliance with state and federal laws in Sec. 202(c)(8). The Federal Land Policy and Management Act also requires an active role in preventing air quality violations on BLM lands in Sec. 102(c)(8). The Clean Air Act of 1977 has specific requirements for the federal land managers to protect the air over lands under their jurisdiction.

5. Section 4 of the Wild Horse and Burro Protection Act (1971) requires that wild horses or burros that stray from public lands onto privately owned lands be removed upon request from the landowners.

6. Benefit Cost (B/C) analysis will be performed on improvements required to implement new AMPs and other appropriate activity plans subsequent to the EIS. The B/C analysis will be performed in compliance with Bureau policy.

7. Permanent roads would not be constructed into project sites. Existing access, off-road travel, or temporary roads which could be rehabilitated after construction activity would be used.

8. Construction of all fences would conform with the objectives and specifications in Bureau Manual 1737 to assure minimization of impacts to wildlife, wild horses, recreation, and visual resources.

9. Fences in wild horse herd areas would be located or constructed in accordance with NSO Manual Supp. 4730 so as to minimize interference with the normal distribution and movement of wild horses. Selected portions of new fences constructed in these areas would be flagged or otherwise marked for one year after construction to make them more visible to horses.

10. The clearing of vegetation from project sites would be restricted to the minimum amount necessary.

11. Application of herbicides, such as 2,4-D, on proposed treatment areas to reduce sagebrush and other plant species would be in accordance with procedures established in Bureau Manual 9222 and other applicable regulations, laws, and court orders to ensure nonimpairment of other than target species.

12. All disturbed areas would be rehabilitated, where such action is necessary and practical, to replace ground cover and prevent erosion.

13. Maintenance of structural improvements shall be provided by the user deriving the primary benefit from the improvement through cooperative agreements and as specified in the Bureau's 1982 Rangeland Improvement Policy.

14. Transfer of lands from federal ownership will be subject to the following provision: Mineral rights will be reserved to the United States unless there are no known mineral values in the land or the nonmineral development of the

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land is of more value than the minerals and the reservation of mineral rights interferes with such nonmineral development.

15. Lands not identified as suitable for disposal would be retained in public ownership. The determination of suitability will include, but will not be limited to, an analysis of Threatened and Endangered Species, wetlands, riparian areas, and flood plains.

16. All public land within the planning area will be designated to control off-road vehicles (ORVs). All lands not specifically designated closed or limited to ORVs will be open to such use.

17. Rights-of-way for public access would be reserved prior to disposal of lands, where appropriate.

18. None of the lands identified as suitable for disposal would be transferred to other ownership if a cultural resources survey shows that they contain sites determined to be eligible for inclusion in the National Register of Historic Places, unless appropriate mitigation measures can be implemented.

19. Livestock permits would be adjusted, if necessary, to reflect decreases in public land forage available for livestock grazing use within an allotment as a result of land tenure adjustments.

20. When public lands are disposed of or devoted to a public purpose which precludes livestock grazing, the permittees and lessees will be given two years' prior notification, except in cases of emergency (i.e., military defense requirements in time of war, natural disasters, national emergency needs, etc. before their grazing permit or grazing lease and grazing preference may be cancelled in whole. A permittee or lessee may unconditionally waive the two-year prior notification. Such a waiver shall not prejudice the permittee's or lessee's right to reasonable compensation for the fair market value of his interest in authorized permanent range improvements located on these public lands.

21. Each wilderness study area will be managed in accordance with Section 603(c) of FLPMA and the Interim Management Policy and Guidelines for Lands Under Wilderness Review (1979) in order to preserve its wilderness characteristics until Congress either designates it as Wilderness and includes it in the National Wilderness Preservation System, or officially releases it from further wilderness consideration. If designated as Wilderness by Congress, each wilderness area would be managed in accordance with the Wilderness Management Policy (1981) and the Wilderness Management Plan developed for that individual area.

22. Any lands released by Congress from further wilderness consideration will be managed in the same manner as similar lands in the Proposed RMP.

23. A Threatened and Endangered Species clearance for plants or animals would be required before any part of the plan were implemented that could affect a Threatened or Endangered Species or its habitat. If any part of the plan could impact a Threatened or Endangered Species or its habitat, the project would be modified, or abandoned if appropriate measures were not feasible.

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24. Water for wildlife and wild horses and burros will be made available at livestock watering developments when livestock are not using them, where appropriate.

25. Spring improvement projects would be fenced and water would be piped away from the source to a trough or pond if necessary. Water would also be left at the spring source.

26. Where the need is identified for wildlife use, water improvements would include bird ramps in watering troughs, lateral water sites off pipelines, overflows at troughs, protected seep areas, and fences around spring developments.

27. Brush control either through application of herbicides, prescribed burning, or by mechanical means would be in accordance with the Memorandum of Understanding between the Nevada Department of Wildlife and the Bureau of Land Management. These procedures specify among other things, that vegetation control measures would be prohibited on sage grouse breeding complexes, wintering grounds, or within 100 yards of a stream or meadow.

28. Mineral resources survey reports will be prepared by the U.S. Geological Survey and the U.S. Bureau of Mines on all areas with a preliminary recommendation as suitable for wilderness designation. The mineral resources reports will become part of the information used for the final recommendations on wilderness suitability.

29. Reasonable access will be allowed for all valid existing rights established prior to wilderness designation.

30. Operations on valid mining claims located in a designated wilderness area will be authorized pursuant to 43 CFR 3809 and subject to the provisions of the Wilderness Act.

31. Plans of Operation and Applications for Permit to Drill on oil and gas and geothermal leases within a designated wilderness area will be reviewed in accordance with NEPA subject to the provisions of the Wilderness Act.

32. During the pre-construction and construction periods, the Bureau will make modifications to any right-of-way necessary to maintain stability of geologic materials, fish and wildlife habitats, the environment, and the public interest.

The Bureau will, if necessary, suspend any construction or maintenance activity of a right-of-way grantee if there is an immediate threat to life (including wildlife and aquatic life), property, or the environment.

33. A right-of-way grantee shall abate any conditions existing that could potentially cause irreparable harm or damage to any person or property.

34. Existing roads and trails will be used whenever possible during right-of-way construction.

35. The right-of-way grantee shall permit free and unrestricted public access to and upon the right-of-way for all lawful and proper purposes, except in

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areas designated as restricted by grantee with the consent of the Bureau in order to protect the public safety or facilities constructed on the right-of-way.

36. The Bureau must approve the location of all rights-of-way prior to construction by an analysis of the proposed action through an environmental assessment, cultural resources clearance, Threatened and Endangered Species evaluation, and a visual resource management evaluation.

37. The right-of-way grantee will use every reasonable means to minimize erosion and soil damage in connection with any construction, rehabilitation, or maintenance operations under a grant, including (but not limited to) construction of water bars, cross ditches, or other structures.

38. The right-of-way grantee shall remove or dispose of all waste in accordance with a plan approved by the authorized officer and in a manner consistent with federal, state, and local laws and regulations.

39. Revegetation of disturbed lands along rights-of-way will be required in areas as identified by the Bureau. The appropriate seed mixture and proper planting techniques will be specified by the Bureau.

40. The right-of-way grantee's activities in connection with the project system in key fish and wildlife areas will, when necessary, be restricted by the Bureau during periods of fish and wildlife breeding, nesting, spawning, lambing or calving activity, and during major migrations of fish and wildlife.

41. All operations under right-of-way grants will be conducted in such a manner as will avoid: a) Permanent blockage of any drainage system; b) Changing the character, or causing the pollution or siltation of rivers, streams, reservoirs, ponds, water holes, or springs; and c) Damaging fish and wildlife resources and habitat.

42. The right-of-way grantee will take such measures as are necessary to assure unrestricted passage and movement of fish and wildlife. No artificial structure or stream channel alteration that would cause a blockage of the movement of fish will be allowed.

43. Right-of-way grantees shall construct, maintain, operate and/or modify structures and facilities as directed by the Bureau to protect and minimize adverse effects upon raptors and other wildlife. Raptors will be protected through the use of "Suggested Practices for Raptor Protection on Powerlines", Raptor Research Report No. 4, Raptor Research Foundation, Inc. 1981. Grantee shall report any and all wildlife kills, including raptor electrocutions, discovered or reported on or near project facilities to the Bureau.

44. A complete intensive cultural resources survey (BLM Class III) must be completed and documented by the Bureau, or if the Bureau deems necessary, qualified archaeologists engaged by the right-of-way applicant prior to issuance of a grant. Known or located cultural sites would be avoided within the corridors when locating roads and towers.

45. Grantee will immediately bring to the attention of the authorized officer all antiquities or other objects of historic or scientific interest, including

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but not limited to historic or prehistoric ruins, fossils, or artifacts discovered as a result of operations under right-of-way grants, and will leave such discoveries intact.

46. Materials and colors used in powerline tower construction will visually blend with the surrounding landscape to meet the approval of the Bureau. Only non-reflective materials will be used for towers, lines, and insulators.

47. All mining operations, other than casual use, occuring within an ACEC area are approved through a Plan of Operation filed pursuant to 43 CFR 3809, so as to prevent unnecessary and undue degradation.

Burros in the Marietta area proposed for special designation as a Wild Burro Range.

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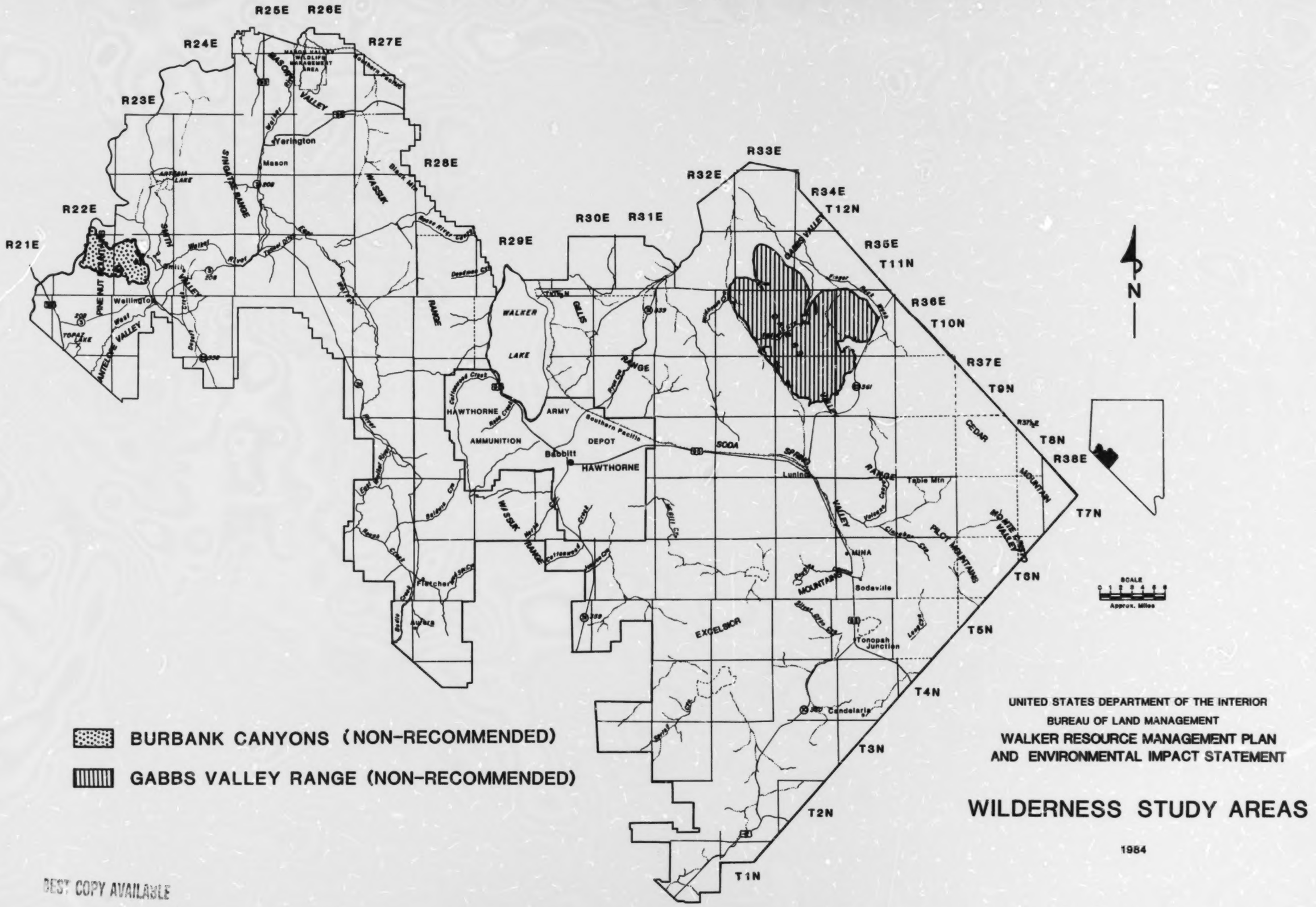

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WALKER RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT

WILDERNESS STUDY AREAS

1984

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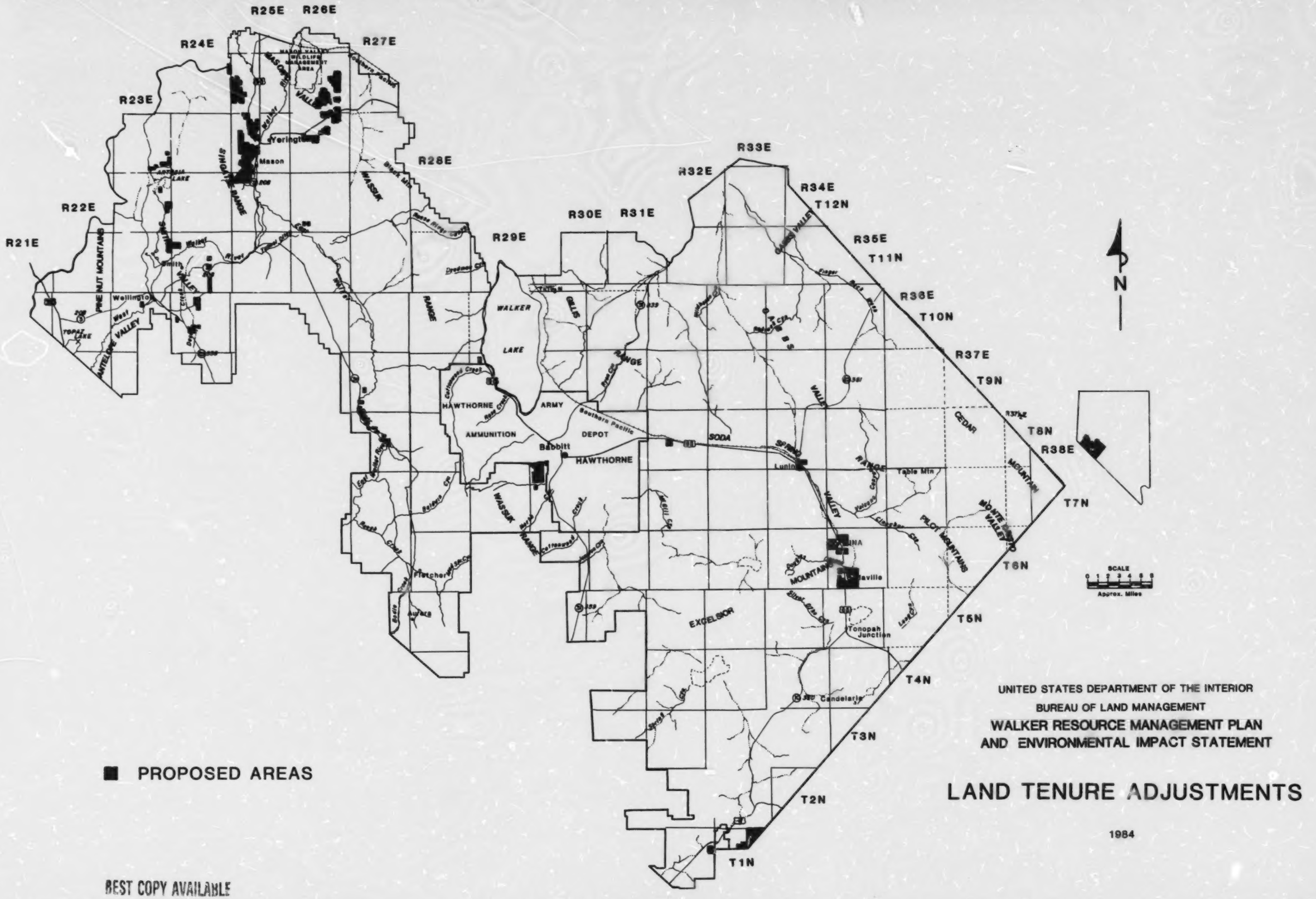

■ PROPOSED AREAS

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WALKER RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT

LAND TENURE ADJUSTMENTS

1984

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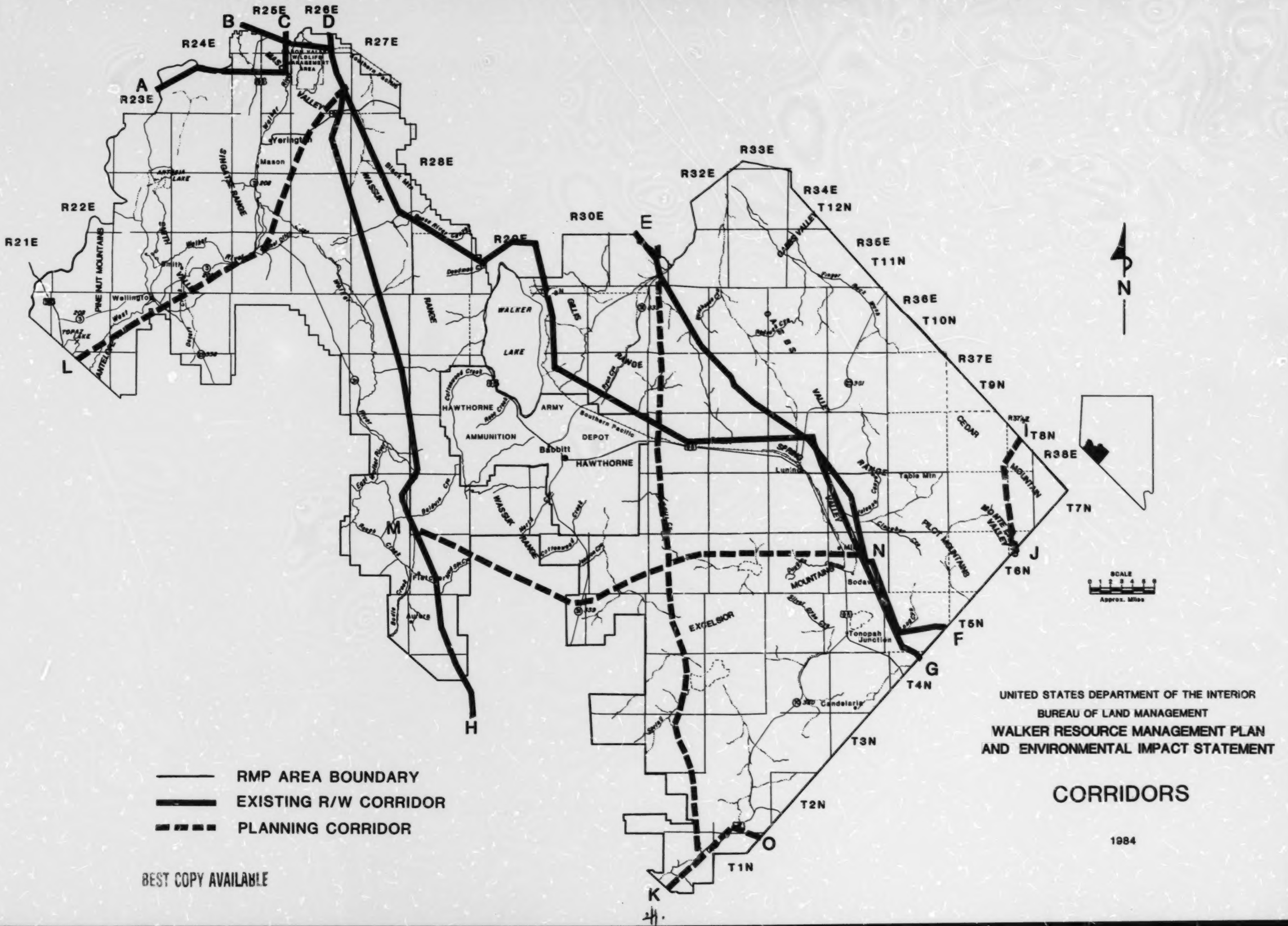

RMP AREA BOUNDARY

EXISTING R/W CORRIDOR

PLANNING CORRIDOR

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

WALKER RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

CORRIDORS

1984

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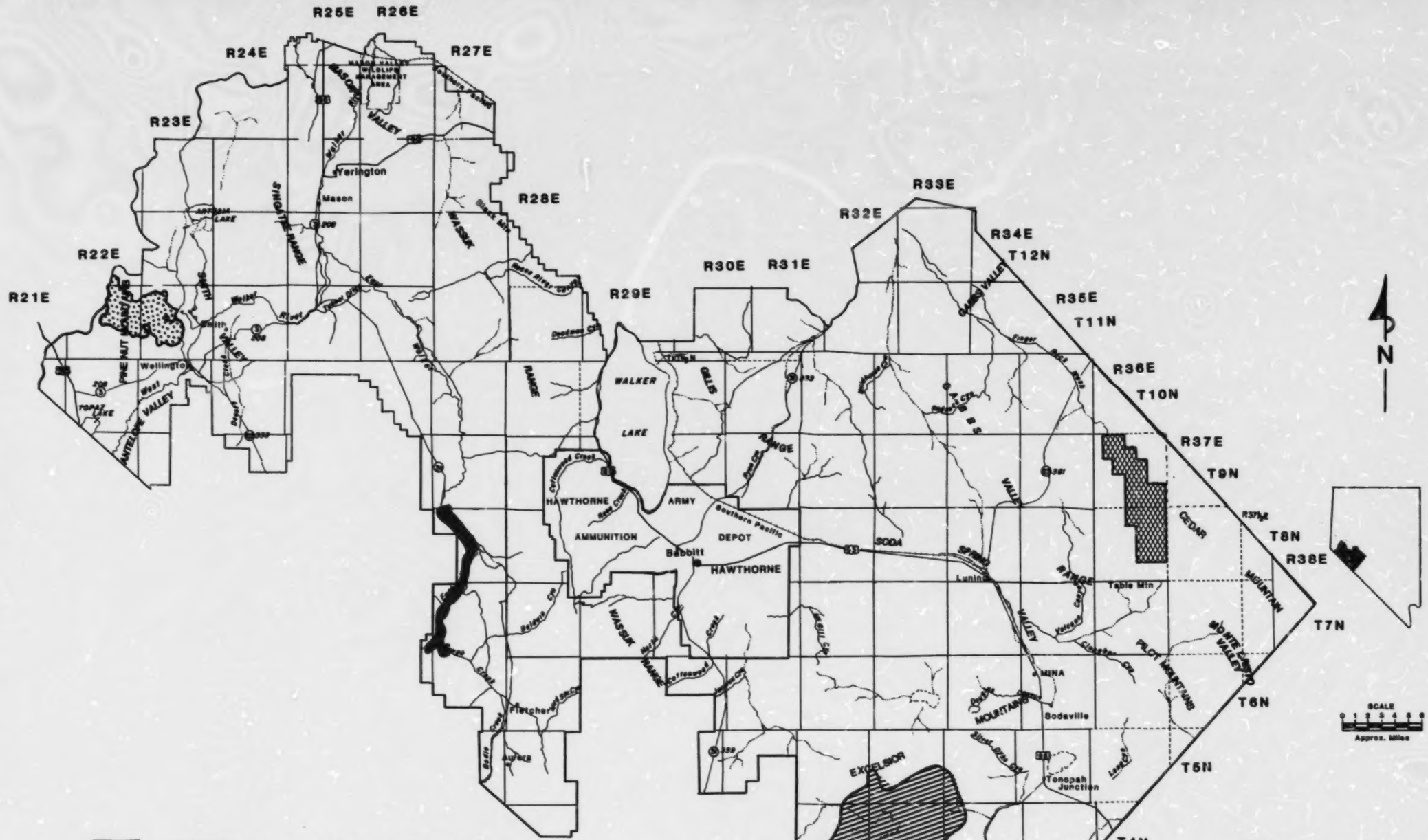

BURBANK CANYON (Scenic Area)

STEWART VALLEY (Paleontological Site)

EAST WALKER RIVER (Scenic Area)

MARIETTA (Wild Burro Range)

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UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

WALKER RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT

SPECIAL DESIGNATION AREAS

1984

CHAPTER THREE

REVISIONS, ADDITIONS, AND ERRATA

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CHAPTER THREE

ADDITIONS, REVISIONS, AND ERRATA

The following sections outline changes to the original Draft RMP/EIS and are intended to replace or expand the segments referenced.

CHAPTER THREE

The following footnote is added to Table 3-3 on page 3-8 of the Draft: "The utilization figures refer to use by all grazing animals."

The last sentence of the first paragraph on page 3-11 is changed to read: "Seven of the 41 allotments exceed 55 percent average utilization, the recommended level in the 1981 Nevada Rangeland Monitoring Procedures."

CHAPTER FOUR

Paragraph five on page 4-5 is revised to read: "Apparent competition with livestock for key forage plants on mule deer winter range would continue in ...".

CHAPTER FIVE

The List of Preparers shown on page 5-1 is amended to include Ronald Buder, Geologist. Credentials: B.Sc. Geology/Mining; Experience: Soil Scientist (15 years) - Bureau of Indian Affairs, District Surface Protection Specialist (7 years), Resource Area Geologist (4 years) - Bureau of Land Management.

APPENDICES

Paragraph six on page A-31 is revised to delete the reference to increased costs in wilderness areas.

The sheep ranch data on page A-37 is revised as follows: The last four lines referring to cattle under Livestock Production are eliminated. The figures under Ranch Resources are changed to read: Private Grazing Lease, 1180 AUMs; Owned Range, 2625 AUMs; Owned Pasture, 5767 AUMs; and Hay Produced, 1502 AUMs.

GLOSSARY

The definition of reasonable numbers has been expanded for clarification: "The long term average of big game populations or the number of individuals historic habitat could support if reintroductions were to occur. The numbers are cooperatively developed and agreed upon by the BLM and NDOW."

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CHAPTER FOUR

CONSULTATION AND COORDINATION

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CHAPTER FOUR

CONSULTATION AND COORDINATION

The land use planning process for the Walker Resource Area commenced with the Notice of Intent published in the Federal Register on March 31, 1983. News releases announcing the beginning of Issue Identification, the first step in the process, were published in local newspapers. Letters were sent out to all agencies, interest groups, and individuals on the Walker mailing list on April 7, asking for input on issues and concerns which needed to be addressed in the Resource Management Plan (RMP). Comments were received until May 20, 1983. A total of 27 written comments were received. On April 28, 1983, representatives from the Carson City District Office were available in Hawthorne, Nevada to solicit comments in person. Two persons from the community expressed their concern regarding livestock use in the area. No others came in.

Bureau personnel met with various county commissions throughout the months to keep them informed of the planning process, and to identify their concerns regarding resource uses in the planning area. Briefings were held with the District Advisory Council and the Grazing Advisory Board.

This process resulted in the identification of 21 concerns or issues. These were either consolidated into broader issues or eliminated from detailed analysis in the RMP. The final result was three issues carried through the RMP: Rangeland Management, Wilderness, and Land Tenure and Rights-of-Way Corridors.

On August 16, 1983, a letter was sent out to the public requesting comment on draft planning criteria which guide the planning process. A total of 13 responses were received, generally favorable. The draft criteria were retained with no changes.

In addition, a ranch budget questionnaire was used to gather social-economic data from several ranchers who use public land for grazing in the planning area. The information volunteered by these ranchers was used in analyzing impacts to the livestock industry.

SCOPING

On May 10, 1984, a news release was issued to local newspapers opening a 30-day comment period on the preliminary alternatives for the RMP. In addition, a letter which contained a summary of the alternatives was mailed to over 350 interested individuals and organizations. The letter requested commentors to consider which alternative would be preferred, what management actions for the various alternatives should be changed, and what impacts from the alternatives should be analyzed. An open house for public comments on the alternatives was held in Hawthorne on May 24th.

A total of 27 responses were received. They resulted in several changes in the alternatives, identification of potential impacts, and the selection of Alternative B as the Preferred Alternative.

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PUBLIC REVIEW AND HEARINGS

A Notice of Availability of the Walker Draft RMP/EIS was published in the Federal Register on October 26, 1984, and was filed with the Environmental Protection Agency on October 18, 1984 thus opening a public comment period ending on January 25, 1985.

Public hearings were scheduled for December 4, 1984 in Reno, Nevada and December 5, 1984 in Hawthorne, Nevada. These were announced in the Federal Register Notice, as well as through news releases to local newspapers and in a letter accompanying each Draft RMP/EIS mailed out to the public.

A total of 61 persons attended the two hearings; 12 making oral presentations in Reno, and seven in Hawthorne.

Letters of comment were received from 82 persons or agencies, including comment from the Governor's State Clearinghouse for Nevada.

Transcripts of the public hearings are available for inspection at the Carson City District Office, 1050 E. William, Suite 335, Carson City, Nevada.

AVAILABILITY OF THE DRAFT

The Walker Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS) was mailed to 400 agencies, organizations, companies, and individuals who indicated an interest. The Draft RMP/EIS and the Walker Wilderness Technical Report were both available to the public upon request from the Carson City District Office.

The Draft RMP/EIS was mailed to numerous governmental agencies and organizations for comment. These include, but are not limited to, the following:

Congressional

Senator Chic Hecht
Senator Paul Laxalt
Congresswoman Barbara Vucanovich

Federal

Department of Agriculture
  U.S. Forest Service
  Soil Conservation Service
Department of Defense
Department of Energy
Department of the Interior
  Bureau of Indian Affairs
  Bureau of Mines
  Bureau of Reclamation
  Fish and Wildlife Service
  National Park Service
  U.S. Geological Survey

Department of Transportation
Environmental Protection Agency

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State Offices

Office of the Governor, Nevada
Nevada State Clearinghouse
State Multiple Use Advisory Committee
State Oil and Gas Mining Advisory Board
State Bureau of Mines and Geology

Indian Tribes

Walker River Paiute Tribal Council
Fallon Paiute Shoshone Business Council
Intertribal Council of Nevada
Yerington Paiute Tribe

State Legislators

Assemblyman Joseph E. Dini, Jr.
Assemblyman Kenneth Redelsperger
Senator Lawrence Jacobsen
Senator Richard Blakemore

Local

Lyon County Commissioners
Mineral County Commissioners
Mineral County Planning Commission
Douglas County Manager
Douglas County Commissioners

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Copies of the Draft RMP/EIS are available at the following BLM District and State Offices or public libraries:

Bureau of Land Management Offices

Office of Public Affairs
Bureau of Land Management
18th and C Streets
Washington, D.C. 20240

Nevada State Office
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

Bishop Resource Area
873 N. Main St., Ste. 201
Bishop, California 93514

Battle Mountain District
North 2nd and Scott Street
Battle Mountain, Nevada 89820

Las Vegas District
4765 Vegas Drive
Las Vegas, Nevada 89102

Elko District
Idaho Street
Elko, Nevada 89801

Ely District
Star Route 5, Box 1
Ely, Nevada 89301

Winnemucca District
705 E. 4th St.
Winnemucca, Nevada 89445

Libraries

Nevada State Library
401 N. Carson
Carson City, Nevada

Mineral County Library
Hawthorne, Nevada

Douglas County Library
Minden, Nevada

Ormsby Public Library
900 North Roop Street
Carson City, Nevada

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Lyon County Library
20 Nevin Way
Yerington, Nevada

Main Library
University of Nevada
Reno, Nevada

Government Publication Dept.
Getchell Library
Univ. of Nevada, Reno
Reno, Nevada

James Dickson Library
4505 Maryland Parkway
Univ. of Nevada, Las Vegas
Las Vegas, Nevada

AVAILABILITY OF THE PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

document has been mailed to all those who received copies of the Draft RMP/EIS, as well as those who commented on the document. A Federal Register Notice and news releases have been issued to inform the public of the availability of this document. A limited number of additional copies are available upon request from the District Office. Review copies are available at the listed BLM offices and public libraries. They are also available at Federal Depository Libraries.

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PUBLIC COMMENT ON THE DRAFT RMP/EIS

All substantive comments from the public hearings and all letters of comment are reproduced in this document except as noted. Responses have been prepared to comments which relate to inadequacies or inaccuracies in the analysis or methodologies used, identify new significant impacts, recommend reasonable new alternatives, involve disagreement on interpretation of significance, or indicate significant misconceptions or misinterpretations of Bureau programs and policies.

This section is divided into two parts. The first part includes comments and responses to the Draft RMP/EIS. The second part of this section contains the comments received from Governor Bryan following the State's Consistency Review of the Preliminary Final RMP/EIS.

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PART ONE
COMMENTS AND RESPONSES TO THE DRAFT RMP/EIS

Hearing Testimony

1-4 Charles Watson
5-8 Robert Warren

Letter No.	Commentor
1	Grayhill Exploration Co.
2	John Hart
3	SOHIO Petroleum Co.
4	Freeport Exploration Co.
5	Harry Melts
6	The Wilderness Society
7	National Park Service
8	Nuclear Regulatory Commission
9	Fischer - Watt Mining Co.
10	William Berry (Representative of 37 others with similar comments)
11	Combined Metals Reduction Co.
12	Nevada Miners and Prospectors Assoc.
13	Coeur Explorations, Inc.
14	Environmental & Health Sciences Consult.
15	WHOA
16	Southern California Edison Co.
17	Tenneco Minerals
18	Wildlife Management Institute
19	Reed Secord
20	California Assoc. of 4 WD Clubs
21	Dorothy Legarreta
22	Department of Energy
23	U.S. Air Force
24	ARCO
25	Women in Mining
26	B. Degonia
27	U.S. Bureau of Reclamation
28	Donald E. Savage
29	Sweetwater Ranch Co.
30	The Wildlife Society
31	Union Geothermal Division
32	John R. Swanson
33	Nevada State Governor's Clearinghouse
34	Sierra Club (Rose Strickland)
35	Sierra Club (Marjorie Sill)
36	Douglas County Community Development Dept.
37	Dave McNiel, et al
38	David Hornbeck
39	William D. Roberts
40	Coxie Roberts
41	U.S. Fish and Wildlife Service
42	Resource Concepts, Inc.
43	Paul Clifford
44	W.F. O'Malia
45	Environmental Protection Agency

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52.

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Testimony

Reno Hearing

Testimony

Charles Watson:

1. "There is a strip on the southeast side which is extremely colorful and beautiful, it closely resembles the kind of spectacular thing that we see in Artist Drive in Death Valley National Monument....this colorful, very...what we call the Malapie area in the southeast part of Gabbs Valley Range."

2. "---we find the failure to designate Walker Lake as an ACEC an astonishing omission.

   ---we particularly take exception to a statement made in the report which in essence says...No matter what the BLM does it will not affect the resource...in the Walker Lake area."

3. "In regard--in connection with wild rivers and other areas containing waters in the state, in the case of this resource area and many of the other areas in central Nevada and southern Nevada the sage grouse is now undergoing an alarming decline. Some experts place this at over 90 percent in central and southern Nevada, yet no inventory of this species or other threatened species in Nevada such as the sage grouse has been attempted or even contemplated in this resource area document."

4. "NORA must protest any attempt to consider what Congress might or might not do in the future.

Testimony

...We have to--the BLM must restrict itself to what existing law mandates them to do. It's irrelevant to say that some day in the future a wilderness study area might be subject to Class I air status, when it is not now subject to such status.

So no decision can be made based on speculation on whether there is something going to be done by Congress or not. I object to this, we protest this."

Response Letter

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Reno Hearing

Responses

1. The area referred to does have colorful rock formations, however, that alone does not qualify an area for designation as wilderness. Much of the area is outside the boundaries of the WSA due to the extensive mining activity and the number of roads. Portions within the WSA also have the highest mineral potential and interest in the WSA. Therefore, the area was not recommended for designation as wilderness.

2. Walker Lake does not meet the relevance criterion required for ACEC designation. This criterion applies where special management attention is needed to protect important resources (BLM Manual 1617C.1(a)). Currently, public lands adjacent to Walker Lake (about 64,000 acres) are provided comprehensive management and protection under the Walker Lake Recreation Management Plan. This special management attention protects and enhances the scenic and recreation qualities of those lands. As far as the water quality of the lake itself, it is primarily a function of historically declining precipitation levels and upstream water use on private lands. Land use actions on public lands either adjacent to Walker Lake or anywhere else in the planning area have minimal, if any, effect on the lake's water quality. Therefore, ACEC status is not appropriate.

3. The responsibility for inventorying sage grouse population levels rests with the Nevada Department of Wildlife (NDOW). They prepare estimates of population trends based on annual brood counts. The Bureau (BLM) is responsible for management of sage grouse habitat on public land. As part of this management, the Carson City BLM District has maintained an ongoing inventory of sage grouse strutting grounds in the Walker Planning Area. While this effort is ongoing and not yet completed, the available data was used in the preparation of the draft RMP.

   It should be noted that the sage grouse is not considered a threatened or endangered species. Two federally listed Threatened wildlife species are found on public land within this planning area - bald eagles and the Lahontan cutthroat trout. The Carson City District participates in an annual eagle monitoring program and is cooperating with the U.S. Fish and Wildlife Service on a recovery plan for Lahontan cutthroat trout.

4. No consideration was given to potential future Congressional actions in developing wilderness alternatives. Recommendations were developed based on the criteria and quality standards set forth in the Bureau's Wilderness Study Policy.

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Hawthorne Hearing

Testimony

Robert Warren:

5. "We do, however, raise questions about the Burbank area proposal because it is for a scenic area...because a scenic area, if managed as one would expect it to be managed, primarily to preserve the scenic-cultural-recreational activities in the area and would not automatically cause an exclusion of mining activities or close the lands for mineral entry.

   However, my investigation regarding the state office in this matter, on scenic areas, also reveals that the administrator...has substantial powers over the use of scenic areas and how they shall be managed.

   He can, if he wishes to, place very tight limitations on any activities including off-road vehicle, mining or ranching.

   He could in fact even withdraw lands from mining and thereby prohibit entry for prospecting and eventually prohibit mining activities."

6. "...the BLM is proposing a Scenic Area along the East Walker River, and today I contacted the district attorney for Lyon County because it has been my remembrance that not too long ago the Lyon County Commissioners had repealed an ordinance that had been inacted in 1980 because they found that that ordinance was discouraging mining and mineral exploration in their county.

...That ordinance at that time did provide for some protections for the East Walker River scenic area, or the East Walker River, actually,...it said you shall not mine any closer than 1,000 feet from the center of the river.

That has been repealed...but BLM has taken the exact opposite approach and in this instance it is not in conformance with the county plan of Lyon County, as you gentlemen know, the Federal Land Policy Management Act states that the BLM shall attempt to draft its proposals for wilderness or other management activities in conformance with or at least substantial conformance with the master plans of the county."

7. "I would like to comment also more specifically, on page 3-44, there are some comments on economic structure and the development of...impacts of mining or lack of mining activity on the wilderness...

   I would suggest that the BLM drafters...make use of a publication that was prepared by the University of Nevada a couple years ago now by three economists at the university...which was called the Economic Impact of Mining on the State of Nevada.

   ...It would also give you some help on your page 3-50, your drafter had some trouble, I think reaching a reliable multiplier, a realistic multiplier for the mining industry.

   The three professors out there have developed what we think is a more realistic multiplier..."

Response Letter

5. The preferred alternative proposes to establish a limited off-road vehicle designation. It does not propose to withdraw the area from mineral entry, therefore mining and mineral exploration will be allowed to continue. The scenic area designation would result in the requirement for Plans of Operation for all mining related surface disturbing activities rather than just those over five acres in size. It is beyond the scope of this document to speculate about whether or not these lands could be withdrawn at some point in the future, however, it should be noted that the scenic area designation does not give BLM management any additional authority in regards to mineral withdrawals.

6. In May, 1974, 3,712 acres were designated as the "East Walker River Scenic Area" under 43 CFR 2070. This designation recognized the area's outstanding natural beauty and established the Bureau's goal to manage the area in its natural condition for fisheries, wildlife, recreation and other uses. This designation is in conformance to the Lyon County General Plan which states: "The entire length of the Walker River should be reserved as a recreation and ecological easement for walking trails, picnic sites, wildlife sanctuaries, etc."

   The Lyon County District Attorney was contacted in regards to the subject ordinance. He states that the ordinance was repealed in response to input by the local mining industry. He said that by repealing this ordinance the county is essentially out of the business of regulating mining, except in the Comstock area. He further states that the county has not adopted any ordinance which is in conflict with the East Walker River Scenic Area designation.

7. The multipliers in the publication referred to would grossly underestimate the contribution of the mining industry to the local economy. In fact, the Lyon County mining multiplier in that publication was less than one (1). This would indicate that the mining industry has a negative impact on the economy. By contrast, BLM's multiplier used in the Draft RMP indicated that the mining industry has a positive effect on the local economy. John Dobra, UNR Economics Professor and a co-author of the subject publication was contacted in regard to this issue. He indicated that there were major statistical and theoretical problems with the Lyon County and Mineral County mining multipliers. He felt that the multiplier used for the Draft RMP was more reasonable and realistic.

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5b.

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Testimony	Response Letter
8. "...your data on page 3-45 and again on 3-50, I believe, is quite outdated. You've used 1981 information and 1981 data concerning the employment base,...all of the economic indicators for this county and the other counties based upon 1981 data. Certainly BLM is capable of using 1983 data, it's available from public sources and it should be used to update your document... At least the document will be more accurate if it doesn't change your conclusions."	8. The draft RMP analyzed all public land related industries, not just mining. While 1983 data is available for the mining industry, the most up to date comprehensive data on the local livestock industry is for 1981. Since it would not be appropriate to compare 1983 mining data with 1981 livestock data, 1981 is the preferred base year. Furthermore, while it is recognized that economic data ages rapidly, the expense to the public of continually updating data can only be justified if it would result in different conclusions or decisions. The Nevada Bureau of Mines and Geology (1981, 1983) indicated a net <u>decrease</u> in mining activity in Lyon and Mineral Counties from 1981 to 1983 primarily due to the closure of the Nevada Schelite Mines. However, this would result in no changes in either our conclusions or decision, particularly since 1983 was an unusual year due to the recession.

Comment Letter 1

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BUR OF LAND MANAGEMENT
CARSON CITY DIST OFFICE
Oct 29 2 20 PM '84

GRAYHILL
Exploration Co.

October 24, 1984

Mr. Thomas J. Owen
District Manager
Bureau of Land Management
1050 East William Street, Suite 335
Carson City, Nevada 89701

RE: Preliminary Comment to -
(Draft) Walker Resource
Management Plan and EIS
: (East Walker River Scenic Area)

Dear Mr. Owen:

Grayhill Exploration Company controls 5000 acres of unpatented mining claims adjoining 1280 acres which have been segregated from appropriation under the general mining laws to protect the scenic values of the East Walker River Scenic Area.

Grayhill fully recognizes the importance of this "Area of Critical Environmental Concern" for riprarian habitat, fisheries and scenic values and will continue to work with Bureau officials to mitigate mineral exploration disturbance adjacent to withdrawn areas.

Grayhill's former joint venture partner Denison Mines (U.S.) Inc. operating under a Notice of Intent, which was mistakenly approved by the Bureau, completed a drill hole on segregated land, results of which are very anomalous in precious metals content. Grayhill will make all factual data concerning this drill hole available to assist in formulation of management actions.

At this juncture Grayhill wishes to propose streamlining the withdrawn areas associated with the East Walker River Scenic Area. Our proposal is embodied by a revised withdrawal

GRAYHILL EXPLORATION COMPANY
12189 Ralston Road, Suite 210 • Arvada, Colorado 80004 • 303-420-9831

4-13

58

Comment Letter 1

Response Letter 1

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1-1 | that would segregate the lands 500 feet on either side of the Walker River and release other lands to regulated mineral exploration and other public uses.

This proposed revision to withdrawn status of public lands is deemed in the public interest. The habitat, fisheries and scenic values would remain protected by existing regulations and the revised segregation of public lands. The economic benefits to the population of Mineral and Lyon Counties may be significant should the results of Denison's drill hole be duplicated on adjoining lands. Given the depressed per capita income for both Mineral and Lyon Counties the Bureau should give serious consideration to the proposal outlined above.

Grayhill does not consider a mere publishing of this letter in the final EIS as sufficient consideration. Please contact me should the Bureau wish additional data to assist in development of management actions for this area of high mineral potential.

Sincerely,

Grayhill Exploration Company

Robert F. Hemming
Geologist/Land Manager

RFH:sa
cc:Honorable Paul Laxalt
Mr. Edward P.Sprang
Mr. Robert E. Warren

CERTIFIED MAIL #P713 410 169
RETURN RECEIPT REQUESTED

4-14

1-1 The current mineral segregation is defined by using the rectangular coordinate system. For the most part, the segregation includes the river and adjacent viewshed. While there are points where redefining the segregation along topographic boundaries would not impact the scenic, recreational or other values protected under segregation; a corridor 1,000 feet wide which rigidly follows the river would not adequately take these values into account, especially in the area of interest to Grayhill Exploration Co. The proposal offered by Grayhill has been considered, but has not been adopted into the RMP.

Comment Letter 2

JOHN HART

Nov. 4, 1984

Mr. Thomas J. Owen
District Manager
Carson City District
Bureau of Land Management
Carson City, Nevada 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft RMP and EIS for the Walker Resource Area.

I would like to urge that Alternative D be adopted with respect to the two Wilderness Study Areas, subject only to such minor boundary changes as might suggest themselves for manageability's sake.

I cannot claim to have visited either the Burbank Canyons or the Gabbs Valley Range. However, the narrative makes it clear that the wilderness values present in both areas are considerable and that the other resources foregone by wilderness designation are, in fact, negligible.

Thus even the rule of thumb stated in the Wilderness section of Alternative B--"Manage as wilderness only those areas for which wilderness values are higher than other values...." makes wilderness classification seem the proper solution. Manageability problems would provide the only excuse for not recommending designation, and this justification should be given only modest weight. Only major and pervasive manageability problems, in my view, would provide a convincing reason for recommending against wilderness status for an otherwise qualified area.

Since the land is qualified for wilderness, I urge you to look for ways of solving management problems, rather than making management problems a rationale for proposing no classification at all.

Sincerely,

John Hart

Comment Letter 3

SOHIO PETROLEUM COMPANY

November 12, 1984

Thomas J. Owen, District Manager
Bureau of Land Management
1050 East William Street, Suite 335
Carson City, Nevada 89701

RE: Walker Planning Area
Douglas, Lyon and Mineral
Counties, Nevada

Dear Mr. Owen:

Sohio agrees with the recommendation of the BLM set forth in the subject document.

We appreciate the opportunity to comment on the plan.

Sincerely yours,

SOHIO PETROLEUM COMPANY

P. J. DeNiro
Senior Staff Landman

PJD/jas/0124Tp45

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4-15

40.

Comment Letter 4

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FREEPORT

FREEPORT EXPLORATION COMPANY
A Division of Freeport Minerals Company

Valley Bank Plaza
South Virginia & Liberty
P.O. Box 1911
Reno, Nevada 89505
Phone (702) 323-3361
Telex 910-395-7000

November 13, 1984

Bureau of Land Management
Nevada State Office
1050 East Walker St.
Suite 335
Carson City, NV 89701

ATT: Thomas J. Owen,
District Manager

RE: Walker Resource Area
Management Plan and EIS

Dear Mr. Owen:

Thank you for the opportunity to review and comment on the Draft Resource Management Plan and Environmental Impact Statement for the Walker Resource Area.

Freeport Exploration Company personnel have worked in this area on a number of occasions in the past few years. After review of the plan, we believe the BLM has done a very good job of reviewing this Resource Area and that the Preferred Alternative provides the proper management necessary to adequately protect the resources of the area.

We've reviewed the management objectives and at this time see no conflict which cannot be worked with. Again, let me thank you for the opportunity to comment.

Very truly yours,

M. L. Berkbigler
Legal Assistant

60.

Comment Letter 5

Response Letter 5

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District Manager
BLM Carson City District
#335-1050 E.William
Carson City, NV 89701

14.11.84.

Dear Sir,

In reference to the Walker RA RMP and EIS Drafts these comments:

In general I am in agreement with the BLM's Preferred Alternative B my main interest is, recreational use of BLM lands and I do agree with your state data supporting the NO wilderness status for the WSAs under consideration and instead to create a Burbank Canyon Scenic Area with ORVs allowed on existing roads and trails. The logical recreational use type, considering these areas.

Own lands which will be disposed legal access needs to be made a prerequisite to any lands retained to ensure continued or even improved access to any recreational values .

5-1 It is disappointing that this planning document does not plan for any preparation of interpretive and informational material for the benefit of the recreational land user. No provisions are made for general visitors use guides or ORV guidance maps. Other Recreation Areas with a more progressive outdoors recreation planning so clearly state in their RMPs; having found that such recreational user guides to be a cost effective management tool. I hope this omission will be remedied in the final version of the RMP.

Incerel, Harry Melts

Harry Melts
P.O.Box 64
Porthill, ID 83853

5-1 Since recreation was not identified as an issue for the Walker RMP, it would not be appropriate to include recreation guide maps in this document. Surface management or land status maps can be obtained from the Carson City District Office for a small fee. Topographic maps are available from the U.S. Geological Survey. These maps can also be obtained from most retail map dealers.

Comment Letter 6

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THE WILDERNESS SOCIETY

FOUNDED IN 1935

December 3, 1984

Mr. Thomas J. Owen
District Manager
Carson City District
Bureau of Land Management
1050 E. William, Suite 335
Carson City, NV 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft Resource Management Plan and Environmental Impact Statement for the Walker Resource Area.

The Wilderness Society strongly objects to the preferred alternative "B," which would recommend neither Burbank Canyon nor Gabbs Valley Range as suitable for wilderness designation. By placing them in the inventory, BLM has already determined these two areas to possess suitable wilderness characteristics. In the Walker Wilderness Technical Report BLM describes 90% of Gabbs Valley and 80% of Burbank Canyons as natural. Gabbs Valley has excellent opportunities for solitude, especially in the center canyons, while Burbank Canyons boasts excellent to outstanding solitude and dayhiking opportunities.

The state of Nevada would benefit greatly by the addition of these two wilderness areas. Wilderness is a scarce commodity in Nevada; currently only one area, Jarbidge, exists. Both Gabbs Valley Range and Burbank Canyons would add to the presently underrepresented Great Basin Physiographic Region. The west-central section of the state also lacks riparian areas, which serve as valuable watering, feeding and resting sites for both wildlife and livestock. Less than one percent of the Walker Planning Area is riparian habitat. A wilderness designation would protect three hundred acres of riparian habitat in Burbank Canyons. Non-designation "could result in mining activities degrading riparian habitat within those areas." We do not feel a "Scenic Area" designation would be strong enough to protect this precious resource.

Both WSAs would also suffer deterioration of scenic values because of mining and increased ORV activity, as well as soil erosion and vegetation removal. Non-designation could also have a negative impact on the bald eagle wintering area in Red Canyon Creek.

216 POST STREET, #400, SAN FRANCISCO, CA 94108
(415) 982-2793

4-18

63.

Comment Letter 6

Response Letter 6

6-1 We also object strongly to the way BLM has presented Alternative E, the All Wilderness Alternative. Wilderness designation does not preclude grazing. The Wilderness Act states that "...the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture" [sec. 4(d)(4)(2)]. Tacking a "no grazing" provision on the All Wilderness Alternative distorts the intent of the Wilderness Act and the mandate of FLPMA. It is our opinion that the All Wilderness Alternative should be presented alone, without the "no grazing" attachment, thus making it a more widely acceptable alternative. We also urge the BLM to adopt this alternative as the preferred one.

The Wilderness Society also urges Wilderness rather than ACEC designation for Stewart Valley and East Walker River. Stewart Valley's significant and abundant fossil resources should be congressionally preserved and protected for the study and appreciation of future as well as the present generations. The Barstovian insect fauna is the "best record of Middle Miocene insects in the world." Furthermore, "the abundance, diversity [and] excellent preservation of the fossils, [as well as] the diverse types of sedimentary rocks, makes this area a uniquely ideal setting for research and educational uses."

The section of E. Walker River has been identified as "one of the more outstanding remaining natural river systems in the Great Basin" by the Heritage Conservation and Recreation Service. This area has outstanding scenic, archaeological and recreational values, and would, again, best be protected under a wilderness designation.

Burbank Canyons and Cabbs Valley Range represent a mere five percent of the entire Walker Planning Area. This leaves 95% of the area that can be developed. Wilderness is as valuable a use as mining or geothermal leasing or ORV activity. Considering the small size of the WSAs in relation to the rest of the area, and the outstanding wilderness characteristics they possess, it is certainly a responsible and reasonable request to recommend them both as wilderness. At the very least we urge BLM to adopt instead Alternative D, which would redefine the boundaries to omit areas of highest mineral activity.

Thank you for your consideration of our response.

Sincerely,

Patricia Hedge
Regional Director, California-Nevada

Jeri Galbraith
Administrative Assistant, California-Nevada

6-1 The Draft does not state or imply that livestock grazing is precluded in wilderness areas, in fact it clearly states that livestock grazing would continue in wilderness areas (Page 2-20). Neither the Wilderness Act nor FLPMA prohibit including "no grazing" and "all wilderness" proposals in the same alternative.

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Comment Letter 7

Response Letter 7

United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

450 GOLDEN GATE AVENUE, BOX 36063

SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

L7619 (WR-RPE)

December 5, 1984

Memorandum

To: District Manager, Bureau of Land Management, Carson City

From: ACTING Regional Director, Western Region

Subject: Draft Walker Resource Management Plan and Environmental Impact Statement

In accordance with the State Director, Bureau of Land Management, Nevada, letter of October 10, 1984, we have reviewed the subject document and have the following comments.

7-1 1) The DEIS devotes considerable time and discussion to various environmentally sensitive topics (e.g., range management, vegetation, soils, wild horses/burros, etc.), however, the discussion of cultural resources by comparison is brief, superficial and weak. Moreover, the Chapter V - List of Preparers does not acknowledge input by the BLM Carson City District archeologist(s).

7-2 The Chapter 6 - Consultation does not acknowledge any input regarding cultural resources nor does it indicate under "Availability of Report" that any comments were solicited from the Nevada State Museum, the State Historic Preservation Office, the University's Department of Anthropology at Reno, or local

7-3 archeologists and historians of which there are many in the DEIS area of concern. Similarly, the References section does not cite any archeological surveys or archeological literature.

7-4 2) Chapter 2 (page 2-27) indicates, to some extent, BLM's awareness that historic preservation laws and regulations do exist but there is no followup discussion of the compliance process. A reference is made to the effect "Class III inventories" will be conducted prior to any action taken. The Class III inventory should be defined in detail.

Page 2-27 also notes that the "public review process is outlined in Chapter V; however, it is reviewed in Chapter VI.

7-5 3) Chapter 3, page 3-27: A number of known site types are listed; however, what do we know about the density, distribution, and significance of the known cultural sites? A one sentence paragraph on page 3-39 indicates one site, the East Walker River Petroglyph Site, is on the National Register or Historic Places. Obviously, many more of the known sites are potentially eligible for nomination to the National Register.

7-1 The Walker Draft RMP/EIS has been prepared in conformance to the President's Council on Environmental Quality (CEQ) regulations. It is CEQ policy "...to reduce paperwork and the accumulation of extraneous background data, and to emphasize real environmental issues..." (40 CFR 1500.2(b)). Since cultural resources are not a significant issue in the Walker Resource Area, they have not been discussed in detail. CEQ regulations state: "There shall be only brief discussion of other than significant issues." (40 CFR 1502.(b)) (emphasis added)

In conformance to those same regulations, we have listed only those "...persons who were primarily responsible for preparing the environmental impact statement..." (40 CFR 1502.17) (emphasis added)

Copies of the CEQ regulations are available upon request from the Carson City District Office.

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7-2 Please refer to page 6-4 of the Draft which states that public contacts include but are not limited to those listed in Chapter 6. The list in Chapter 6 includes the Nevada State Clearinghouse. Nevada, along with 47 other states, has established a clearinghouse for comments on federal projects from state agencies (including the Museum and the Division of Historic Preservation and Archaeology) in conformance with Presidential Executive Order 12372 of July 14, 1982. Comments have also been requested from UNR's Dept. of Anthropology as well as local archaeologists and historians including but not limited to the Nevada Archaeological Association and the Nevada Historical Society. It would not be appropriate to publish a copy of our entire mailing list in this document - that list has more than 400 names. It should be noted that any organization or individual can be added to our mailing list on request.

7-3 While archaeological surveys and literature were used in previous planning documents to determine that cultural resources were not a significant issue, they were not cited in the Draft and, therefore, were not included in the references section.

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Response Letter 7

7-4 Class III inventories are described in detail in BLM Manual 8111 which is available upon request from this office. As required by CEQ regulations, this material is referenced rather than reprinted in detail in the Draft (40 CFR 1502.21).

7-5 Please refer to Response No. 7-1.

Comment Letter 7

Response Letter 7

7-6 4) Discussions of cultural resources in the document suffer from clumsy and/or meaningless language. For example, the following statement appears on page 4-51:

> "Land exchanges, miscellaneous land actions and development of range and wildlife improvements would be mitigated under normal cultural resources measures." (See also a similar statement on page 4-63).

How are land exchanges, or range and wildlife improvements mitigated? What are "normal cultural resources protection measures"? Is the Section 106 process and consultation with the SHPO being referred to? If so, please specify. To comply with Section 106 of the National Historic Preservation Act and Executive Order 11593, the BLM and the SHPO should make a formal determination of effect (36 CFR 800.4) regarding potential impacts for each of the proposed alternative actions (A through E) and develop a compliance plan for mitigating specific adverse impacts for the alternatives.

We appreciate the opportunity to comment on the Plan and EIS.

W. Russell Wirth

cc:
WASO (762)
IAS

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7-6 Please refer to the Standard Operating Procedures Section of Chapter 2 of the Draft for normal cultural resources protection measures. This section specifically cites the Section 106 process.

The Bureau follows the procedures described in the Historic Preservation Regulations (36 CFR 800.4) since those regulations apply to all Federal agencies as specified in 36 CFR 800.1. These procedures will be conducted at the appropriate point in the Walker planning process - that is at the activity planning stage when site specific actions are developed.

Comment Letter 8

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 10 1984

Mr. Thomas J. Owen, District Manager
Carson City District
Bureau of Land Management
U.S. Department of the Interior
1050 E. William, Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

In response to the letter dated October 19, 1984, from Mr. Edward F. Spang, State Director, BLM, we have reviewed the Draft Resource Management Plan and Environmental Impact Statement for the Walker Resource Area. Our review was directed to whether the action described in the draft EIS involved matters within our jurisdiction by law or special expertise or had any potential impact on NRC licensed facilities. No potential effects were identified; therefore, we have no specific comments on the draft EIS.

Thank you for the opportunity to review the draft document.

Sincerely,

Richard H. Vollmer, Director
Division of Engineering
Office of Nuclear Reactor Regulation

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Comment Letter 9

Response Letter 9

Fischer-Watt Mining Co Inc

ADMINISTRATIVE OFFICE
340 FREEPORT BLVD. SUITE 3
SPARKS, NEVADA 89431
PHONE (702) 358-0847

FIELD OFFICE
114 TUCKER SUITE 7
KINGMAN, ARIZONA 86401
PHONE (602) 753-1822

District Manager
Carson City District
1050 E. William, Suite 335
Carson City, Nevada 89701

10 Dec. 84

Gentlemen:

After careful review of the Draft Walker Resource Management Plan and EIS for the Walker Resource Area, I feel that, of the sujgested alternatives, only Alternative No. A (the No Action alternative) can be the logical choice. This choice is supported by myself and the company for the following reasons:

1. No lands will be withdrawn for Wilderness classification. In the Walker Resource area, this is a paramount requirement as this area is one of the most well-mineralized portions within the state of Nevada. To withdraw any acreage, no matter how little, in such a well-mineralized area, is to prevent local citizens from obtaining the benefit of jobs, security, and economic growth from potential future mining operations. To say that any acreage within the Walker Resource area has low to minimal mineral potential is absolutely ridiculous, as new mineral discoveries are made several times a year within the area.
2. Alternative A is the most cost-effective. During these recessionary times, both government and the private sector must select the least expensive plans. If Alternative A is selected, $196,000.00 will be saved over the next more conservative alternative.
3. Burbank Canyon (NV-030-525A) is within an area of extremely attractive mineral potential. Evidence for this is obvious: two patented claims are within the area, the South Camp Mine and the Taylor Hill mines are within the southern portions of the area, the Red Canyon gold claims border and overlap the northern boundary of the area, and the Washoe gold claims border and overlap into the western border of the area. Needlesstosay, the area is extremely well mineralized and should have no restrictions for mineral entry. Although it may be argued that designation of Burbank Canyon as a Scenic Area will not restrict mineral entry, in practise and in fact, such a designation effectively prohibits mineral exploration and development.

9-1

9-2

For the above reasons, we feel Alternative A should be selected.

Sincerely,

L. J. Buchanan, manager

LJB:jh

9-1 The mineral favorability classification scheme takes into consideration the geologic environment and inferred geologic processes. It is outlined in detail in the Geology, Energy and Mineral (GEM) Reports for each WSA. These reports are available for review at the Carson City District Office. These reports are based on analysis of existing data. They indicate that portions of the WSAs are either unfavorable or have low favorability for the accumulation of mineral resources. Any areas recommended for designation as wilderness will have intensive mineral inventories conducted by the U.S. Bureau of Mines and the U.S. Geologic Survey.

9-2 Please refer to Hawthorne Hearing Response No. 5.

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Comment Letter 10

UNIVERSITY OF CALIFORNIA, BERKELEY

BERKELEY · DAVIS · IRVINE · LOS ANGELES · RIVERSIDE · SAN DIEGO · SAN FRANCISCO — SANTA BARBARA · SANTA CRUZ

DEPARTMENT OF PALEONTOLOGY — BERKELEY, CALIFORNIA 94720

RECEIVED
BLM
DEC 24 10 25 AM '84
CARSON CITY DISTRICT
DISTRICT MANAGER'S OFFICE

December 19, 1984

Mr. Thomas J. Owen, District Manager
Carson City District
Bureau of Land Management
Department of the Interior
Suite 335
1051 East William Street
Carson City, NV 89701

Dear Mr. Owen:

10-1

Re: preservation of the Stewart Valley area, Mineral County, Nevada.

The Department and Museum of this University have been involved with the paleontology of the Stewart Valley area since J. C. Merriam first collected fossil vertebrates there in 1912. The fossils and the geology have been the subject of one master's program, three doctoral programs and at least eight or nine publications by people associated with the Department/Museum. The importance of the area is specifically mentioned in the book by Donald Savage and Donald Russell on the Vertebrate Paleofaunas of the World.

The complexity of the geologic setting and the diversity as well as excellent preservation of the fossils provides us with one of the best samples of land life known for this interval of geologic history.

The importance of the fossil insects alone would justify preservation of the Stewart Valley area. Fossil insect remains are very rare. Only three or four sites in North America approach the abundance and degree of preservation found at Stewart Valley. Of these, the Florissant, Colorado localities are the most famous. The Stewart Valley insects surpass those from Florissant both in numbers of specimens and by nature of their superb preservation. Another important consideration is that the Stewart Valley fossils are a different age (younger) than those from Florissant. The loss of this natural resource alone would be a major loss to both the public and scientific community.

As Director of the Museum that has collected and maintains the largest holding of fossils from the area, I strongly support the Bureau of Land Management in your effort to preserve this unique natural resource. Your active interest, involvement and support toward this goal is appreciated by the educational and scientific community.

Sincerely,

William B. N. Berry

Enclosures

4-25

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Response Letter 10

10-1 A total of 38 letters were received in support of the ACEC for the Stewart Valley paleontological site. Due to financial considerations only one letter representative of all was published. The following is a list of those who wrote letters which were not printed in this document. These letters are available for review at the Carson City District Office:

Frank Almeda - California Academy of Sciences
Frank L. Lombrecht - Univ. of California, Irvine
Robert W. Fields - Univ. of Montana
Marcizna Rinaldi - Univ. of California, Berkeley
Ulrich Weiss - Dept. of Health and Human Services
Peter Robinson - Univ. of Colorado, Boulder
John M. Rensberger - The Burke Museum
Philip R. Bjork - South Dakota School of Mines and Technology
Robert Hunt Jr. - Univ. of Nebraska, Lincoln
Scott L. Wing - National Museum of Natural History
Wade E. Miller - Brigham Young Univ.
Richard H. Tedford - American Museum of Natural History
Charles J. Smiley - Univ. of Idaho
John A. Wilson - Univ. of Texas, Austin
Spencer G. Lucas, PhD. - Univ. of New Mexico
Jason A. Lillegraven, - Univ. of Wyoming
David P. Whistler - Natural History Museum (Los Angeles)
D. Charles Dailey - Sierra College
Paul H. Arnaud Jr. - California Academy of Sciences
Maryjka Mychajlowycz - Univ. of Toronto
Leigh W. Mintz - California State Univ., Hayward
Michael J. Novacek - American Museum of Natural History
C. Don MacNeill, PhD - City of Oakland Museum
Raul A. Opler - The Assoc. for Tropical Biology, Inc.
Allison R. Palmer - The Geological Society of America
Sue E. Hirschfeld - California State Univ., Hayward
Robin J. Wootton, B.Sc., PhD. - Univ. of Exeter, Great Britain
Manya B. Stoetzel - Agricultural Research Service, USDA
Stephen W. Edwards, PhD. - East Bay Regional Park District
Edward O. Wilson - Museum of Comparative Zoology, Cambridge
Harvey I. Scudder - Environmental & Health Sciences Consultants
Dale Nations - Northern Arizona Univ., Flagstaff
R.M. Bohart - Univ. of California, Davis
Stephen M. Rowland - Univ. of Nevada, Las Vegas
Howard E. Schorn - Univ. of California, Berkley
Daniel I. Axelrod - Univ. of California, Davis
John E. Mawby - Fresno, Cal.

Comment Letter 11

COMBINED METALS REDUCTION COMPANY

Pine Lake Valley Via Tonopah, NV 89049 (702) 573-2352

December 13, 1984

Bureau of Land Management
Carson City District
Carson City, Nevada

re: Comment WSA 030-407

Wilderness Study Area 030-407 in the Gabbs Valley Range is not suitable for wilderness designation because of its greater importance as a mining district.

This is a highly mineralized area, which for some time has been enjoying increasing exploration activity by several prospectors and mining companies. It extends from the Bovard-Rand Mining District on the north end to the Santa Fe Mining District on the south. It lies only ten miles from Rawhide; eleven miles from the "Paradise Peak" operation; and is just across the highway from Westley's Santa Fe project, all three projects being in the advanced stages of development. Our own exploration department has recently identified ten seperate mineral targets along a seventeen mile trend much of which lies within WSA 030-407.

This Wilderness Study Area should be dropped from further wilderness consideration because of its high mineral value and economic importance.

We appreciate your attention to this matter.

Very truly yours,

COMBINED METALS REDUCTION COMPANY

Jeremy D. Benezet

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Comment Letter 12

NEVADA MINERS AND PROSPECTOR ASSOCIATION
P.O. BOX 283
MINA, NEVADA 89422

December 11, 1984

TOM OWENS, DISTRIC MANAGER
BUREAU OF LAND MANAGEMENT
1050 E. WILLIAM STREET, SUITE 335
CARSON CITY, NEVADA 89701

Dear Tom,

This is in response to the B L M meeting on December 5, 1984 in Hawthorne, Nevada at the El Capitan. They are asking for input on the Walker Resource Management Plan Area.

We are taking the position that any areas that are set aside for burros or fossils that now or somewhere down the line the environmentalists and Sierra Club will ask for a buffer zone to be placed around these areas. This really scares the local citizens living in mineral county because we have severe winds and tremendously bad dust storms at times and we are afraid that this could be used against us by tring to put buffer zones around these areas to keep the air clean for the clean air act. We are real pleased that the B L M is taking a softer approach about the burro's and the fossils in mineral county. Once you start something on a Federal level it never stops there, it takes over like a cancer and never stops. We in mineral county need this ground open for the survival of this county. We can not afford from a county level to have it tied up. Now the Minerals Division people from the State of Nevada have given you real hard data on the mineral that are in those areas that you are wanting to lock up.

Bob Warren the Executive Secretary of the Nevada Mining Association has pointed out, in three instances in your book that you published there are three errors in there and he asked that you get your facts straight next time or correct these in your book.

I have always had everything that is printed or typed on public interest sent to me. This book was not and I have requested it at the meeting December 5, 1984 and also a phone call the 10th of December, 1984 requesting a copy of it.

You have, if my memory serves me right, a Plan A, B, C and D I think at our meeting here in mineral county. We voted unanimously to not to accept any of your plans that you offer. Plan A would of been nice if you had not of put in 8,000 acres in right over close to a mining project in Stewart Valley so we voted to leave things as they are now.

Sincerely,

Merl Richard

Merl Richard, President of the
Mineral County Chapter of the
Miners and Prospectors Association

71.

Comment Letter 13

Response Letter 13

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4-27

Coeur Explorations, Inc.

A Subsidiary of Coeur d'Alene Mines Corporation

SUITE 26 255 GLENDALE AVENUE SPARKS, NEVADA 89431
PHONE (702) 359-2252

December 14, 1984

Thomas J. Owen
District Manager, BLM
1050 East William Street Suite 335
Carson City, Nevada 89701

Re:Walker Resource Management Plan

Dear Mr. Owen:

I am writing in response to the proposed long range Walker Resource Management Plan. I am in favor of the preferred Alternative "B", under the following reservations:

13-1 A complete mineral investigation be done prior to the sale or exchange of any public lands within the Walker Resource area. If substantial mineral potential is found, then the lands would be withdrawn from sale or exchange status. Although I agree that neither of the WSA's (Burbank Canyon and Gabbs Valley Range) should be recommended as suitable for wilderness designation; I am concerned that limited ORV designation would affect future exploration activities. The proposed Stewart Valley ACEC would have a major adverse impact on the minerals industry. Also costs prior to exploration would increase since plans of operation would be required for any surface distributing activity in the proposed ACEC.

I would not like to see any action which would preclude location of new mining claims without a complete mineral examination.

Sincerely,

Steven Berke
Landman
Coeur Explorations, Inc.

13-1 It is standard operating procedure to conduct a mineral potential examination prior to transfer of lands. Mineral rights are reserved to the United States unless, on examination, there are no known mineral values or the non-mineral development has more value than the minerals, and reservation of mineral rights would interfere with such non-mineral development.

Comment Letter 14

ENVIRONMENTAL & HEALTH
SCIENCES CONSULTANTS
7409 HANSEN DRIVE
DUBLIN, CALIFORNIA 94568
415-828-4338

31 December 1984

Mr Tom Owen
District Manager, Carson City District
Bureau of Land Management, USDI
1050 East William Street, Suite 335
Carson City, NV 89701

Dear Mr Owen:

In reviewing the Draft Walker Resource Management Plan, with regard to the ACEC proposed for the Stewart Valley Fossil deposits, I find that:

The alternatives proposed by the Plan, and their provision for the fossil sites are as follows:

A - Would not designate the sites, involving 16,000 acres, as an ACEC, and would therefore give no site protection.
B - Would designate the 16,000 acres as an ACEC, but not require withdrawal of this area from mineral entry.
C - Would not designate the sites as an ACEC (just as in A).
D - Would designate the16,000 acres as an ACEC, and also withdraw all of this area from mineral entry.
E - For the fossil sites, duplicates D.

The report indicates a staff preference for Alternative B, but under that one, the sites would have no protection from mineral entry, which could well be the major threat we are concerned about.

Alternatives D & E would indeed protect the sites, but as I visualize it, would withdraw from mineral entry an area far more extensive than would be needed just to protect them.

I should like now to propose to you and your staff, if such a negotiation is permissible, that while the entire area of 16,000 acres should constitute the ACEC, a degree of compromise on the mineral rights withdrawal would be a more rational solution than any of the existing

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Comment Letter 14

14-1 favorable alternatives (D & E, and with misgivings, B), and be far more likely to meet with approval.

If the extent of mineral rights withdrawal were such as would protect all the actual fossil-bearing outcrops from damage, and at the same time would guarantee access by qualified scientific and general persons, such a plan would seem to me to be far more likely to meet with approval.

We would therefore opt for a modified Alternative B, setting up the ACEC, but with multiple selected small areas within the 16,000 acres in which mineral rights would be completely withdrawn.

I can see no reason why our interests should preclude the granting of mineral rights beyond the immediate vicinity of our fossil beds, if the beds are protected laterally to the limits to which we would be able to work them, such as with hand equipment, and our access is guaranteed.

My interests in the matter are directed not only by the need to protect the fossil sites themselves from all intrusion, but also to coexist with the legitimate mining rights in a mutually agreeable and politically defensible way, with credit to your agency.

Do let me know your reactions to this proposal, and what may be done to accomplish "the bottom line", as set forth in the preceding paragraph.

Sincerely,

HIS/a

Harvey I. Scudder, Ph. D.
BLM Project Coordinator, Stewart Valley Paleo Inventory

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Response Letter 14

14-1 Alternative B proposes the withdrawal of 1280 acres of the most sensitive tracts within Stewart Valley from mineral entry. Please refer to page 2-7 of the Draft. The Proposed RMP in this document adds an additional 140 acres identified by Dr. Savage of the University of California, Berkeley.

Comment Letter 15

Response Letter 15

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4-30

WHOA!

WILD HORSE ORGANIZED ASSISTANCE INC.
A Foundation for the Welfare of Wild Free-Roaming Horses and Burros

BOARD OF TRUSTEES
DAVID B. BELDING
JACK C. McELWEE
GORDON W. HARRIS
BELTON P. MOURAS
GERTRUDE BROWN, Honorary
In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

P. O. Box 555
Reno, Nevada 89504
Telephone 324-9988
Area Code "02

January 5, 1985

Mr. Tom Owen, District Manager
Bureau of Land Management-Carson City District
1050 East William Street, Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft Walker Resource Management Plan and Environmental Impact Statement. Having had some feedback from previous land use plans in your District; I must add that the general public does not really understand this process and how it applies to them until after the environment in their surroundings are impacted. I believe this is attributable to the lack of publicity in these rural communities, where many residents of intermingled private lands and those abutting public lands reside. Certainly the residents in Spanish Springs did not believe the Pah Rah wild horses pertained to their wild horses.

15-1

WHOA has become increasingly pessimistic that any effort on the part of the general public, WHOA included, will not change the static quo. However, for administrative purposes, WHOA submits our comments on the Walker.

LIVESTOCK

Alternative A and B are identical in that each would maintain the static quo, but more than double the cost to the taxpayer. Please explain how BLM develops fences and cattle guards that would benefit wild horses and wildlife? How does BLM determine the relative value of those resources other than livestock? Alternative C would double the number of livestock on the range and sacrifice 80% of the wild horses in their increasingly limited herd areas. Therefore, WHOA supports Alternative D for livestock grazing.

15-2

15-3

15-4

Monitoring: Who will establish and collect data for the utilization and trend sites?

15-1 Public involvement is an integral part of the planning process. There are at least four stages at which the public is personally requested to comment. This is usually done through mailings to individuals, agencies, local government, interest groups, permittees and industry. In the Walker Planning Area the mailing list includes over 400 such names.

The Bureau uses available media for the purpose of keeping the public informed. In the Walker area the newspapers used to reach the rural residents include the Mason Valley News, the Mineral County Independent, and the Record Courier. Releases of information on planning workshops and hearings are also given to local radio stations (i.e; KOLO, KPTL and KVLV). Also, a representative of the BLM makes a monthly visit to Hawthorne. These visits are also published in the Hawthorne newspapers.

Chapter Six of the Draft describes the public involvement process in detail.

It should be noted that the Walker RMP applies only to portions of Lyon, Mineral, and Douglas Counties, not to areas such as Spanish Springs in Washoe County.

15-2 As specified in Standard Operating Procedures Nos. 8 and 9, fences (and cattleguards) will be constructed so as to minimize adverse impacts to wildlife and wild horses. While fences and cattleguards do not directly benefit wildlife and wild horses, indirectly through contributing to improved range

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Page two-Walker

Range Improvements: No new range improvements should be implemented until monitoring establishes the need. Any range improvement, such as water, must be for multiple use if tax dollars are to be used. Any improvements on public lands with private funds must have stipulations on the permits for multiple uses, including wild wild horses.

15-5 WILDERNESS
WHOA supports Alternative D for Wilderness as further protection of the wild horse habitat. Recommendations to Congress on proposed wilderness must iunclude wild horse herd management plans as part of the existing resource. This alternative could give BLM some incentive for managing horse populations, other than just reduction.

LAND TENURE
BLM has the necessary procedures for the disposal of lands for community expansion without seeking relief. WHOA supports Alternative E.

RIGHT OF WAY CORRIDORS
Applications should be considered on a case-by-case basis and as the need arises. WHOA supports Alternative E.

ACEC
WHOA supports Alternative C for protection of environmentally sensitive lands.

15-6 WILD HORSES
Please explain why wild horses have not been "allocated" any forage? Wild horses inhabit approximately 30% of the State of Nevada, increasingly that 30% has dwindled drastically because of livestock interests and private lands. This is true because of BLM's perception that minority rules over the public interests. While the "fence against regulation" may have been struck down nationally because it was not consistant with the law; Nevada's law states that in designated open range, the private land owner must fence against. Therefore where the federal law does not apply, the State law does.

15-7 Therefore WHOA supports Alternative D for wild horses, with the understanding that sufficient monitoring systems will be developed to attribute overuse to the particular offending animal. All adjustments, upward or downward, dependent upon the data collected through monitoring. If overuse is occuring from wild horses, then the wild horse will be reduced. If overuse is occuring from livestock, then reductions will come from livestock AUMs. If not attributable then both should be reduced pro-rata.

2

management they could improve wildlife and wild horse habitat.

15-3 The relative values referred to are determined by analysis of public input; inventory data; professional judgements; and existing laws, regulations, and policies.

15-4 Those sites will be established through consultation with the affected permittee and other interested parties. Monitoring studies will be conducted by Carson City District staff or interested user groups. The Bureau would welcome assistance from groups such as WHOA.

15-5 Wilderness recommendations to Congress will concern only whether or not to designate areas as wilderness. Management plans will be developed for any areas designated as wilderness. As specified in Chapter Two of this document, these plans will be coordinated with other activity plans, including herd management area plans for wild horses and burros.

15-6 This RMP does not allocate forage to any grazing animals. Such allocations require much more detailed range inventory and monitoring data than is currently available. The proposed RMP establishes a monitoring system to obtain the data needed to determine if any adjustments in livestock or wild horses and burros are necessary.

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Page three-walker

Water developments for wild horses must be developed for multiple use benefit, when tax dollars are used. All developments on public lands with private funds, must have stipulations on the permits for multiple use, including wild horses. Range improvements in herd management areas must inform the interested parties through consultation and coordination.

WILDLIFE

WHOA supports Alternative E for wildlife; and the management of wild horses and livestock in critical wildlife habitat, where data substantiates the need.

WATERSHED AND RIPARIAN

WHOA supports Alternative E for both and the management of wild horses and livestock in riparian zones, where data substantiates the need.

Most sincerely,

Dawn Y. Lappin

Dawn Y. Lappin (Mrs.)
Director

3

15-7 The procedure for making adjustments in livestock and wild horse and burro numbers is outlined in Chapter Two of this document. Briefly, if monitoring data indicate adjustments are needed, they will be made through consultation with interested parties. It would not be appropriate to establish an arbitrary pro rata system at this point in the planning process.

Comment Letter 16

Southern California Edison Company

SCE

P.O. BOX 800
100 LONG BEACH BOULEVARD
LONG BEACH, CALIFORNIA 90801

R. J. JULIFF
MANAGER
OF
REAL PROPERTIES DEPARTMENT

December 6, 1984

Mr. Thomas J. Owen
District Manager
Bureau of Land Management
Carson City District Office
1050 East William Street, Suite 335
Carson City, NV 89701

Dear Mr. Owen:

SUBJECT: Resource Management Plan (RMP)-Draft
and Environmental Impact Statement
Walker Resource Area

Southern California Edison Company appreciates the opportunity to comment on the above subject RMP.

Based on our review of the Draft Walker RMP report and our current information, we have the following comments and recommendations for your consideration.

We are pleased to see the recognition by the planning team of future corridor needs as an issue in the RMP. Corridor designation is a critical element of land use planning and is necessary to insure that routes are available for the orderly and efficient development of communication, energy and transportation systems to serve the public. We, therefore, recommend that the corridor element of the preferred alternative be revised to designate corridors, a minimum of three miles in width, in the locations shown in Alternate C of the RMP.

Designation of the corridors shown in Alternate C will provide the organizations responsible for developing communication, energy, and transportation systems for the public, a means of providing these services in an economical and dependable manner. In addition, a minimum corridor width of three miles will enable flexibility in siting facilities to avoid environmentally sensitive areas.

Thank you for inviting our comments. We hope you will give them your full consideration. If further details are needed, please contact Mr. J. R. Wilson at (213) 491-2992.

Very truly yours,

R. J. Juliff

JRWilson/1269f/dfs

Comment Letter 17

Tenneco Minerals

P.O. Box 270
Lakewood, Colorado 80227
(303) 987-6200
TWX 910 320 2934

January 9, 1985

Mr. Thomas J. Owen, District Manager
Bureau of Land Management
Carson City District
1050 E. William, Suite #335
Carson City, NV 89701

Re: 1984 RMP/EIS, Walker Planning Area, NV.
Recommendation for "Alternative A"

Dear Mr. Owen:

As U.S. Exploration Manager for Tenneco Minerals Company (TMC), I hereby go on record as supporting "Alernative A" of the aforementioned RMP/EIS. As described in this document, "Alternative A" represents a continuation of present resource management and use levels. Actions would be taken on a case-by-case basis as circumstances dictate. In regards to this alternative, I offer the following comments.

Economic mineral deposits are geologically and geographically unique. They do not respect the artificial boundaries placed by man. Mineral deposits are discovered by continually testing new geologic concepts and theories. This is a dynamic approach which should not be impaired by removal of lands from mineral entry. Discovery, development, and mineral production generates new wealth to the public sector as well as to individuals. This new wealth is especially important to the economic livelihood and way-of-life of Mineral and Lyon Counties. I believe this point should be stressed more strongly in the RMP/EIS document.

Geologic conditions in the East Walker River area are extremely favorable for major precious metal deposits. TMC is aggressively exploring the area for disseminated gold deposits similar to that at Borealis. TMC owns and operates the Borealis Mine which employs approximately 90 people. Initial construction costs were about $13.5 million. Expenditures for labor, goods, and services are about $800,000 per month. Significant tax revenues are attributed to Borealis: 1981 - $150,000; 1982 - $250,000, 1983 - $500,000. It is evident that Borealis is a major asset of Mineral County. The potential for additional Borealis-type deposits appears excellent in the East Walker River area in both

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Comment Letter 17

Response Letter 17

Tenneco Minerals

Lyon and Mineral Counties. Numerous exploration companies are active in the immediate area. Owing to the situation, the East Walker River area should not be declared as scenic or wilderness, but should continue to be administered on a case-by-case basi. with present environmental safeguards. I believe this is in the best interest of local government and the greatest number of people.

17-1 In regards to the compilation of the draft RMP/EIS, I find not single a single geologist among the 14 preparers (Recreation Planners, Realty Specialists, Biologists, Conservationists, Economist, Hydrologist, Forester, etc.) Yet, geology and mining are extremely important to the economic health of the region.

17-2 It is also alarming that the document employs outdated 1981 statistics for "Mineral County Income and Employment" and does not reflect current mining income or tax revenues. Furthermore, no consideration is made for the major economic benefits expected from FMC's Paradise Peak gold deposit near Gabbs and Lacana Gold's Santa Fe gold project northeast of Luning. Such

17-3 consideration is important, especially in Mineral and Lyon Counties where per capita income ranks well below the average for Nevada.

In summary, I stress that "Alternative A" should be the preferred alternative. No change is warranted. Present environmental safeguards are adequate and the "multiple use" concept is working well.

Sincerely,

Neil Muncaster
Vice President, Exploration

NMM/bc

17-1 The name of Ron Buder, Walker Resource Area geologist was inadvertantly left off the list of preparers in the Draft. His name has been added in this document. Please refer to Chapter Three.

17-2 Please refer to Hawthorne Hearing Response No. 8.

17-3 It is beyond the scope of this document to speculate about the future economic benefits of either the FMC or Lacana projects, particularly given the unstable nature of the mining industry in the Walker RMP area.

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Comment Letter 18

Response Letter 18

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Wildlife Management Institute
Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice President
L. I. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

January 17, 1985

District Manager
Bureau of Land Management
Carson City District
1050 E. William
STE 335
Carson City, Nevada 89701

Dear Sir:

The Wildlife Management Institute is pleased to comment on DRAFT WALKER RESOURCE MANAGEMENT PLAN and ENVIRONMENTAL IMPACT STATEMENT.

The plan needs clarification and expansion to be satisfactory for wildlife.

It lacks overall standards and guidelines that, when properly done, do much to safeguard the wildlife habitat resources. There are no specific management area guidelines. Lack of these items is a major deficiency. We refer you to the plan for the Jarbridge Resource area recently issued by Idaho BLM as an example of the information we are talking about.

18-1 There are few details on how the range conditions will improve, only that AMP's and range developments will improve the condition of the range (but not its number of AUM's).

18-2 Master tables of the environmental effects should be included so the alternatives can be compared. The tabulations of one use by allotments do not provide for this need.

18-3 A better explanation of "reasonable numbers" of wildlife is needed. The definition in the glossary is confusing. Since this is the basis for reaching the states wildlife population goals, it should be presented without confusion.

DEDICATED TO WILDLIFE SINCE 1911

18-1 Please refer to Appendix C of the Draft for a detailed description of how range conditions were projected to improve as well as a detailed, allotment specific analysis of projected changes in AUMs.

18-2 Please refer to Summary Table 3 for a comparative review of the environmental consequences of the alternatives.

18-3 The definition of reasonable numbers has been clarified. Please refer to Chapter 3 of this document.

Comment Letter 18

Response Letter 18

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18-4 From the data presented we question the need for any range improvements:

Page 2-3 Alternate B - Range Improvements $219,800

Page 2-4 Initial AUM's at the 3 year average $ 36,962
There will be an initial loss of
1,117 AUM and a twenty year gain of
1,087 AUM.

Thus - the 22 permittees on 41 allotments will be beneficiaries of $219,800 in federal (taxpayer) funds and suffer a net loss of 30 AUM. Thus - annual income from grazing fees to the U.S. will decline $41.10, but the government will spend $219,800. With record national deficits, this kind of creative economics and subsidy is highly questionable.

While we prefer Alternative "D" the national values alternative, we recognize that something akin to Alternative "B" will be adopted. We urge that Alternative B be modified to include both WSA's as wilderness, to protect at least some of the area from mineral development.

Some specific comments follow:

18-5 Page 2-1 Alternative "B" "...provides for a mix of natural and commercial resources based on the relative value of those uses." This wording insures that noncommodity uses will be strictly subordinate.

Page 2-30 and 2-31. There are 47 "Standard operating procedures" in this section. Only 8 of the 47 relate to fisheries or wildlife, really only 4 are effective because the other 4 have to do with granting rights-of-way. In addition, 3 of the 8 procedures relating to wildlife and fisheries contain "weasel words" (Nos. 24, 25, 40), which undercut their certainty.

18-6 Page 4-16. Why is there no separation of livestock from Bighorn sheep habitat?

In general, the proposals for riparian zone management seem good. We commend you for a positive interest in improving this critical habitat.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole

Daniel A. Poole
President

DAP:mam

18-4 The correct procedure for analyzing the benefits of range improvements is to compare long term impacts with the improvements to long term impacts without the improvements. This procedure indicates a net gain of 390 AUMs. It should also be noted that rangeland management (including improvements) may yield benefits other than livestock AUMs - these include improved wildlife, wild horse and burro habitat, and improved watershed conditions.

18-5 This alternative does not subordinate non-commodity uses. It includes proposals for the protection and preservation of wild burros though designation of the Marietta National Wild Burro Range, protects valuable fossil resources through designation of Stewart Valley as an Area of Critical Environmental Concern, protects visual resources through Scenic Area designations in the Burbank Canyons and East Walker River areas, protects and enhances critical fisheries and wildlife habitat through management plans for livestock and wildlife which provide for construction of vital range improvements, and also protects and improves key riparian areas and watersheds through construction of range improvements.

18-6 At present the areas referred to - the Wassuk and Singatse Ranges - are relatively low on the list of priorities for bighorn sheep reintroductions due to the presence of domestic sheep.

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Comment Letter 19

2921 NE 55rd Street
Lighthouse Point, Florida 33064
November 11, 1984

District Manager
Carson City District
Bureau of Land Management
1050 E. William, Suite 335,
Carson City, Nevada 89701

Dear District Manager:

Regarding the Walker Wilderness Technical Report, I recommend the establishment of two Wilderness Areas totaling 92,995 acres. I support the All Wilderness Alternative. Wildlife in the Cobbs Valley Range unit include mountain lion, bobcat, deer, and golden eggle. There are 500 acres of riparian habitat in the Burbank Canyon unit. There are also White fir, mountain mahogany, and Jeffrey pine. I lived in Nevada for twenty years and have been to the Pine Nut Mountains. It is important that these two areas be added to the Wilderness System to preserve their primitive condition.

Sincerely,

Reed Record

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4-38

Comment Letter 20

CALIFORNIA ASSOCIATION OF 4WD CLUBS INC.

5831 Rosebud Lane, Unit M-1
Sacramento, CA 95841
(916) 338-4540

January 11, 1985

BLM, Carson City District Office
Mr. Thomas J. Owen, Dist. ict Manager
1050 East William St, Suite 335
Carson City, NV 89707

Dear Mr. Owen,

The Draft Resource Management Plan with E.I.S. has been reviewed and we recommend alternative "B" be adopted as the most appropriate management action. In addition, alternative "B" appears to meet the needs of most of the public concerned with the use of this area. It also provides for some expansion of recreational opportunities in the long term without locking up any more public lands in wilderness status.

We consider your draft plan to be well prepared and easy to understand. Please keep us informed of future action.

Sincerely,

Ed Dunkley
Field Representative

Comment Letter 21

1-15-85

Dear Mr. Oboer

As a resident with my nine children of the Lake Tahoe Basin during the past 30 summers + frequent user of the wilderness areas in Nevada, I protest the BLM's designation of only one Wilderness Study Area at Stewart - completely omitting Burbank Canyon + Gabbs Valley. I also understand your agency did not consider the important riparian issues for the Walker River. I + my children - now adult hikers - urge you + your agency to reconsider.

Sincerely,

Dorothy Leguneta PhD
Adjunct Professor of Basque studies
UN-Reno

Comment Letter 22

Department of Energy
Western Area Power Administration
Boulder City Area Office
P.O. Box 200
Boulder City, NV 89005

JAN 15 1985

Refer To: G1010

5440 BLM WILD.

District Manager
Carson City District
1050 E. William, Ste. 335
Carson City, Nevada 89701

Dear Sir:

We appreciate the opportunity to review the draft Resource Management Plan and Environmental Impact Statement for the Walker Resource Area. Western's directive to meet public demand for Federal power using Federal transmission lines will best be provided by BLM establishing utility corridors. We support the preferred Alternative (Alternative B) which provides for a mix of natural and commercial resource uses while minimizing disruption of the human environment. Western could also support Alternative C.

Sincerely,

G. J. Giles
Assistant Area Manager
for Management Services

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Comment Letter 23

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DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)
630 SANSOME STREET - ROOM 1216
SAN FRANCISCO, CALIFORNIA 94111

ROV (Cox/556-6439)

Walker Planning Area Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS), your letter dated 19 October 1984

Department of the Interior
Bureau of Land Management
Nevada State Office
Mr. Edward F. Spang
State Director
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

1. We appreciate the opportunity to comment on the subject RMP and EIS and we offer the following comments:

a. As you are aware, some of the Walker Planning Area has historically been subject to military overflights which should continue in the future. In the past, there have not been any problems between the Air Force and the Bureau of Land Management concerning potential conflicts between military overflights and management plans. We, therefore, concur with any of the alternatives your agency designates, provided no restrictions are placed on military overflights in wilderness areas.

b. There are certain aspects of the alternatives mentioned which we would be less inclined to support because areas which are appropriate for military overflights are becoming increasingly rare. Desirable characteristics include: relatively isolated locations of sparse populations, areas presently under federal jurisdiction, diverse topography, and areas which lack heavy commercial activities such as mining.

2. Therefore, the Air Force would be more inclined to support the alternative (Alternative D) that provides for the maximum amount of wilderness designation. This support would be based on the condition that no restrictions are placed on military overflights.

3. We appreciate this opportunity to comment on the RMP and EIS concerning the RMP and Walker Planning Area. We consider lands within the Walker Planning Area to be a valuable resource and overflights, to a certain degree, a compatible use of that resource. If, however, this use is determined to be a conflict because of frequency, noise levels or duration of overflights, we hope you will feel free to contact our office to discuss these concerns. Our staff point of contact is Mr. William Cox, (415) 556-6439.

ROBERT B. CAMERON, Acting Chief
Environmental Planning Division

cc: AF/LEEVX
AFESC/DEVN

Comment Letter 24

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AtlanticRichfieldCompany
Public Affairs
555 Seventeenth Street
Denver, Colorado 80202
Telephone 303 293 7570

Peter B. Briggs
Consultant, Public Lands
Rocky Mountain Region

January 16, 1985

Mr. Thomas J. Owen
District Manager
Department of the Interior
Bureau of Land Management
Carson City District
1050 E. William Street
Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

The Atlantic Richfield Company (ARCO) appreciates the opportunity to comment on the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Walker Planning Area. ARCO is a natural resources company with interest in both leasable and locatable minerals throughout the United States. We, as other companies and interest groups, have a large stake in the outcome of the BLM planning process and the subsequent implementation of the plans that are approved.

These plans are the basis upon which public lands will be allowed to be explored and developed for the energy and mineral resources required to maintain and enhance the human environment of our nation. In our opinion, documents such as the Walker Resource Management Plan should be the best that they can be. To this end, we offer the following comments as constructive criticism.

We believe, minerals and energy resources is an issue that should have been identified to receive in-depth attention as did rangeland management, wilderness, and rights-of-way corridors in the subject RMP and EIS.

The importance of minerals and energy resources to the American economy and social fabric is well known. Chapter three of the document states at page 3-32 that ". . . 23 mining districts have produced gold, silver, copper, mercury, lead, zinc, tungsten, manganese, and antimony." These are valuable metals. Appendix E, Table 1 implies that wilderness designation for Burbank Canyons and Gabbs Valley would severely impact mining

in the resource area. Presumably this projected impact was significant in the decision not to recommend the canyons and valley as wilderness areas. Also, page 3-33 indicates that there is significant interest in geothermal resources in the resource area.

24-1 The above historic use and interest, to us, dictates that mineral and energy resources should have been a major issue in the RMP and the EIS. The issue deserves to stand alone and not be subsumed in other discussions within the document.

The Walker plan will affect minerals development and availability in the United States. The direct effects are fairly obvious. For example, the region's employment, tax base and support services will be directly affected by mine development or the lack of it. The indirect effects of mine development or lack of it may be more subtle but are nonetheless profound. The significance of metals and energy sources to the economic and social fabric of the country is well established. The plan should contain mechanisms that allow for exploration and development of minerals above present levels if and when ore bodies become economic to develop.

The EIS regulatory policy itself is to use "all practicable means, consistent with the requirements of the Act (NEPA) and other essential considerations of national policy to . . . enhance the quality of the human environment . . . ." (40 C.F.R. 1500.2(f)). Mineral and energy resource development are essential to the enhancement of the human environment. Constraints on development have an adverse impact. It is also the national policy to encourage and promote the development of mineral and energy resources. This policy has been stated and restated several times in several ways by statutes such as: The Federal Land Policy Management Act; The Mineral Lands Leasing Act; The Strategic Minerals Policy Act; and The Energy and Security Act.

Comment Letter 24

Response Letter 24

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In conclusion, we believe that minerals and energy resources should be a major issue in any plan, particularly in an area such as Walker where production is taking place and has taken place in the past. If you have any questions or wish to discuss the above in greater detail, please contact us.

Sincerely,

Peter B. Briggs

PBB/ko

24-1 A detailed analysis by Carson City District staff concluded that mineral and energy resources were not an issue for the Walker RMP process. This does not mean that mining and energy development are not important or significant in the RMP area. It means that specific proposals for them are not necessary and that existing management is adequate. The impacts to mineral and energy resource development were analyzed in detail in Chapter 4 of the Draft.

Comment Letter 25

Response Letter 25

WOMEN IN MINING

January 17, 1985

Thomas J. Owen
District Manager
Carson City BLM District
1050 East William, Suite 335
Carson City, NV 89701

Dear Mr. Owen,

The following comments concern the Draft Walker Resource Management Plan. After reading the draft alternatives, I support alternative "I" with respect to minerals, wilderness, and the Stewart Valley Paleontological Site.

First, as a member of Women In Mining and a firm supporter of the minerals industry, I feel that nearly all public land should be open to mineral entry. Our country as a whole needs the minerals and metals produced to maintain our high standard of living and security. The state and local economy benefits from the jobs created by the minerals industry. Economic mineral deposits are not convenience items which are available everywhere. A prospector must be given the opportunity to search vast amounts of land to locate the few economic deposits.

Second, I am opposed to both of the Wilderness Study Areas in the management plan. Nevada has enough pending and current wilderness acreage already. Vast acreages of Nevada will retain suitable wilderness characteristics, due to the mountainous terrain, without a federal wilderness designation. Too much public land, wilderness and otherwise, has already been withdrawn from mineral entry and other multiple uses.

Third, I support the Area of Critical Environmental Concern designation for the Stewart Valley Paleontological Site, with 1280 acres withdrawn from mineral entry. I feel that some protection is necessary for this site, although a complete 16,000 acre withdrawal is too much.

25-1 Finally, I have a question. What is the meaning (definition) of the term "segregated from mineral entry" as it appears on page 4-2) concerning the East Walker River? I would appreciate a response, as several people would like to know.

Thank you,

Nancy J. Wotruba

Nancy J. Wotruba, Member
Women In Mining

Battle Mountain Chapter
P.O. Box 1064, Battle Mountain, Nevada 89820

25-1 Please refer to response 40-1.

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Comment Letter 26

Jan 23, 1985

Thomas J. Owen
District Manager
Carson City BLM District
1050 East William, Suite 335
Carson City, NV 89701

Dear Mr. Owen,

The following comments concern the Draft Walker Resource Management Plan. After reading the draft alternatives, I support alternative "B" with respect to minerals, wilderness and the Stewart Valley Paleontological Site.

First, as a member of Women In Mining and a firm supporter of the minerals industry, I feel that nearly all public land should be open to mineral entry. Our country as a whole needs the minerals and metals produced to maintain our high standard of living and security. The state and local economy benefits from the jobs created by the minerals industry. Economic mineral deposits are not convenience items which are available everywhere. A prospector must be given the opportunity to search vast amounts of land to locate the few economic deposits.

89.

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Comment Letter 26

Second, I am opposed to both of the Wilderness Study Areas in the management plan. Nevada has enough pending and current wilderness acreage already. Vast acreages of Nevada will retain suitable wilderness characteristics due to the mountainous terrain, without a federal wilderness designation. Too much public land, wilderness and otherwise, has already been withdrawn from mineral entry and other multiple uses.

Third, I support the Area of Critical Environmental Concern designation for the Stewart Valley Paleontological Site, with 1280 acres withdrawn from mineral entry. I feel that some protection is necessary for this site, although a complete 16,000 acre withdrawal is too much.

26-1 Finally, I have a question. What is the meaning (definition) of the term "segregated from mineral entry" as it appears on page 4-23 concerning the East Walker River?

Thank-you.

B. DeMonia
Women In Mining
member.

Response Letter 26

26-1 Please refer to response 40-1.

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Comment Letter 27

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United States Department of the Interior
BUREAU OF RECLAMATION
MID-PACIFIC REGIONAL OFFICE
2800 COTTAGE WAY
SACRAMENTO, CALIFORNIA 95825

E12-17

IN REPLY REFER TO: MP-150

DEC 13 1984

To: State Director, Bureau of Land Management, Reno, Nevada
Acting
From: Regional Director, Sacramento, CA

Subject: Draft Walker Resource Management Plan and Environmental Impact Statement

We have reviewed the draft plan and environmental impact statement and have no comments to offer. Thank you for the opportunity to review the documents.

Lawrence F. Banaard

41.

Comment Letter 28

Response Letter 28

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UNIVERSITY OF CALIFORNIA, BERKELEY

BERKELEY • DAVIS • IRVINE • LOS ANGELES • RIVERSIDE • SAN DIEGO • SAN FRANCISCO — SANTA BARBARA • SANTA CRUZ

DEPARTMENT OF PALEONTOLOGY

BERKELEY, CALIFORNIA 94720

January 18, 1985

Mr. Tom Owen
District Manager, Carson City District
Bureau of Land Management
U.S. Dept. Interior
1050 East William St., Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

You have received letters from 30 or 40 of my colleagues asserting the importance of the Stewart Valley Miocene strata and fossils to earth and biological sciences. I maintain, as I have proclaimed before in your presence, that the Stewart Valley fossil area is one of the two most important demonstrations of a 15-million-year-old biota and its accompanying geological phenomena of the entire world. It is rivaled only by a district in the Shandong Province of mainland China in its record of nonmarine life but excels the Shandong district with diversity of geologic data (e.g., associated volcanic activity, fluvial environments grading into lacustrine environments, and the like). Also, Stewart Valley is more accessible to scientific investigation and has more extensive exposures of fossiliferous rocks.

The 6 members of our team of investigators who have studied and evaluated the paleontological resources and scientific importance of Stewart Valley under the auspices of the Bureau of Land Management believe that certain of the fossil districts in Stewart Valley should be preserved and protected for qualified and continued scientific investigations. Our opinion on this matter was most aptly expressed by N.I. Scudder in his letter to you of December 31, 1984: "(Our) interests ... are directed not only by the need to protect the fossil sites themselves ... but also to coexist with the legitimate mining rights in a mutually agreeable and politically defensible way, with credit to your agency."

All of my co-investigators agree that a modified Alternative B, as stated on page 2-7 of the DRAFT WALKER Resource Management Plan (1984) will be the best from our standpoint for preservation of the scientific values of Stewart Valley. Our modification reads as follows:

Management Actions

28-1 1. Designate 16,000 acres in Stewart Valley as an ACEC and withdraw 1,420 of those acres from mineral entry.

(This modification allows for a plot of about 140 acres, red-lined Area 2 on the attached extract from the Stewart Valley ACEC Planning Map on file in your office, to be added to the designated 1,280 acres to be withdrawn from mineral entry as indicated in your Alternative B. Our reason for adding this separate small area to be protected is that it produces the best sample of the later, 11-million-year-old, fauna of Stewart Valley and that it will continue to produce mammalian fossils adding to the diversity of this later fauna.)

28-1 The Proposed RMP in this document provides for the expansion of the withdrawal to 1420 acres as requested.

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Comment Letter 28

Mr. Owen, page 2

We deeply appreciate the interest that you and the other officials in the Bureau of Land Management have shown in preserving the scientific value of Stewart Valley and hope that we can continue to be of service to you.

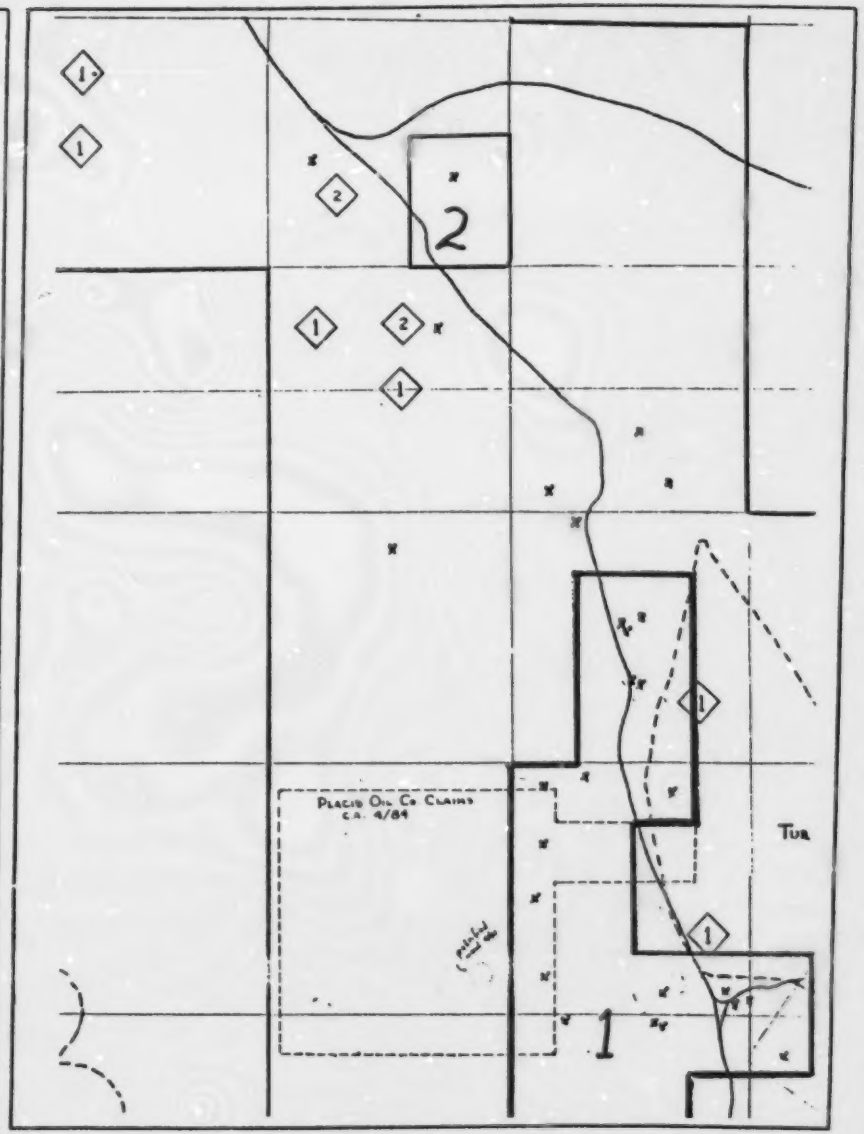
Sincerely,

Donald E. Savage

Donald E. Savage, Professor and
Curator of Higher Vertebrates in the
Univ. Calif. Museum of Paleontology

Cc: Ms. Linda Arwentrout
Co-Investigators

Comment Letter 28



Comment Letter 29

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SWEETWATER RANCH COMPANY
2600 Mission Street, Suite 200
San Marino, California 91108
(818) 799-0394 • (818) 799-0395

January 21, 1985

Mr. Tom Owen
District Manager
Bureau of Land Management
1050 E. William Street
Suite 335
Carson City, Nevada 89701

RE: Comments to the Draft Walker RMP

Dear Mr. Owen:

This correspondence presents the Sweetwater Ranch Company's (SRC) comments to the Draft Walker RMP. Please give these comments your full consideration and acknowledge each concern with a written response specific to the Garfield Flat Allotment. Our comments and concerns are as follows:

WILD HORSES

The SRC has entered into two signed AMP agreements with the Walker Resource Area Staff. This same BLM staff also prepared the Walker RMP. We are perplexed as to how the same professionals can prepare separate, supposedly objective documents, and present conflicting appraisals of the wild horse situation on the Garfield Flat Allotment.

Our 1982 AMP states that until wild horses are significantly reduced, there will continue to be a serious overgrazing problem on the allotment. It also indicates that wild horses have been a resource problem since 1974 when there were fewer that 253 head of horses. We now have well over twice that number of horses on the allotment. Objective No. 4 of the AMP is a reduction in wild horse numbers. BLM utilization mapping conducted prior to livestock turnout on the allotment indicates extensive areas of severe use of forage by horses. The recent draft gathering plan predicts that if horses are not reduced, the result will be a downward trend and increased abuse of the allotment. The 1977 gathering plan presents similar predictions and also documents wild horse degradation of private lands and private waters. In short, there is an overwhelming amount of BLM data documenting wild horse abuse of the Garfield Flat Allotment and which supports the necessity of wild horse reductions. On the other

4-49

94.

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29-1 hand, the SRC is not aware of any BLM data which indicates that the current number of wild horses (which is the Preferred Alternative) are compatible with proper range management objectives of the allotment. Why has the BLM chosen to disregard their own previous data which documents the fact that the current numbers of horses are excessive on the Garfield Flat Allotment?

29-2 The RMP states that declines in forage condition, trend, and productivity would be due to continued overutilization and improper periods of use. However, no such declines in forage are predicted for the Garfield Flat Allotment under the various alternatives. Ironically, the BLM has previously documented extensive overuse of forage by the wild horses and has even advocated increased use during the critical growing season under Alternative "D". Why would the extensive overuse of forage by wild horses and increased utilization during the critical growing season by horses not result in a downward trend on the Garfield Flat Allotment?

RMP ALTERNATIVES

As presented in the RMP, the SRC supports the implementation of Alternative "C". This statement is based on the following points:

- It is the only alternative which is compatible with the Garfield Flat AMP.
- It is the most beneficial alternative in terms of proper range management. AUM demand during the critical growing season is reduced by over 80 percent due to the reduction in wild horses.
- Wild horses remaining after the gather would be healthier due to the reduced competition between horses for forage.
- The livestock operation would benefit by the increased availability of forage. Currently, wild horses have overgrazed important cattle forage areas prior to livestock turnout.

29-3 It is interesting to note that while this alternative analyzes livestock use at preference levels, it represents the lowest total forage demand on the Garfield Flat Allotment of five alternatives presented in the RMP. In the BLM's estimation, would implementation of Alternative "C" be the most beneficial course of action in terms of the vegetation resource on the Garfield Flat Allotment?

29-1 Previous data was not disregarded but was considered insufficient to base reductions on. Since that time additional monitoring data has been obtained which was sufficient to base reductions in Garfield Flat allotment as outlined in the Proposed RMP in this document.

29-2 The RMP projects improvements in forage condition, trend and productivity for all alternatives except No Action. Previous documents have identified specific areas of overuse in the Garfield Flat allotment. The Draft analyzed trend on an allotment wide basis. This analysis indicated that while there would be specific areas of overuse, the overall trend on the allotment would be static.

29-3 Alternative C would be the most beneficial in the short term only. In the long term the proposed rangeland monitoring and grazing adjustment program would result in similar benefits to the vegetation resource for all alternatives except No Action.

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The SRC is adamantly opposed to the selection of Alternative "D" as the final RMP and is alarmed that the BLM would even consider such an alternative as "reasonable". Page 4-52 of the Draft RMP states "However, overall these AMPs (i.e., Garfield Flat, etc.) and their associated range improvements should result in improved livestock distribution, rest for specific grazing areas, and a subsequent increase in forage production". The SRC is forced to agree that improved livestock distribution would result from the implementation of Alternative "D", since only three head of cattle (17 AUMs at 5.5 months) would be allowed to graze the 235,000 acre allotment. The SRC would no longer be an economically viable unit with the implementation of Alternative "D". This alternative,

29-4 which proposes a reduction in livestock use and increases horse use by 34 percent, indicated that the allotment will remain in a static trend. The recent Draft Garfield Flat Capture Plan, while analyzing a similar alternative, indicates that this action would result in a downward trend. Which document, the RMP or the draft gathering plan, is accurate?

The SRC contends that the current numbers of wild horses must be reduced immediately. Therefore, the SRC does not support the implementation of Alternatives "A" or "B". For obvious reasons, the SRC opposes the implementation of Alternative "E".

MULE DEER

29-5 The RMP states the livestock are competing with mule deer for forage on the Garfield Flat Allotment. However, livestock and mule deer distributions overlap only along the area west of Highway 31. According to the RMP, deer utilize this area from November 1 through May 1, while livestock graze this area during the period of February 15 through April 15. Consequently, there is only a limited area of allotment in which livestock and deer graze in common and only for a two month period. In recent years, the SRC has implemented a water hauling program in which to improve livestock distribution in this pasture. As a result, this area has not received extensive livestock use. The BLM statement regarding livestock/deer competition for forage is pure speculation and not based on any documentation. The SRC would appreciate that statements regarding cattle/deer competition on the Garfield Flat Allotment in the RMP be presented as speculation as opposed to fact.

RANGE IMPROVEMENTS

The RMP proposes 3.5 miles of fence for the Garfield Flat Allotment under Alternatives A, B, and C. The SRC assumes that the

Response Letter 29

29-4 Both documents are accurate. The Draft RMP analyzed trend on an allotment wide basis and concluded that the overall trend would be static. The gather plan analyzed site specific areas of the allotment and concluded that particular areas would have a downward trend. These areas comprise about ten percent of the allotment and are located at Garfield Flat and Whiskey Springs.

29-5 Mule deer and livestock use overlaps not only in the area west of Highway 31 but also along the Excelsior Mountains in the Garfield Flat Allotment. The reference to livestock and mule deer competition on page 4-5 of the Draft refers to apparent competition in areas where studies are lacking. Please refer to Chapter Three of this document.

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Comment Letter 29

29-6 Blm is referring to the controversial Whiskey Flat cross fence. Hopefully, proposing this fence in the RMP does not negate the BLM's agreement to reevaluate the proposed fence in the spring of 1985. We believe that our attempts to improve livestock distribution through the use of water hauls has alleviated the Bureau's need for the cross fence.

CONCULSION

The BLM has analyzed five alternatives which propose dramatic differences in total forage demand and grazing during the critical growing season on the Garfield Flat Allotment. However, the BLM predicts that none of these actions will have any affect on forage condition or range trend on the Garfield Flat Allotment. We find it difficult to concur with the BLM's analysis.

The SRC supports the implementation of Alternative "C". It is the only alternative which attempts to resolve the most pressing issue on the Garfield Flat Allotment: excessive wild horse numbers. The SRC has in the past and will continue in the future to properly manage livestock on the public lands. However, there is little incentive to the SRC if wild horses are allowed to continually abuse the Garfield Flat Allotment. The SRC appraciates the opportunity to comment to the Draft Walker RMP.

Very truly yours,

Bruce S. Jones

Bruce S. Jones

BSJ/jzj

4-52

Response Letter 29

29-6 As Appendix D indicates, these are potential range improvements. Identification of these improvements in the RMP does not preclude reevaluation.

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The Wildlife Society

Nevada Chapter

Mr. Thomas Owen
District Manager
1050 East William Street
Suite 335
Carson City, NV 89701

Dear Mr. Owen:

The attached comments regarding the Draft Walker Resource Management Plan and Environmental Impact Statement are submitted on behalf of the Nevada Chapter of The Wildlife Society. Let us start by conveying this is one of the better DRMP/EISs we have reviewed.

Overall, we support the Preferred Alternative. This alternative represents an action-oriented approach to range and wildlife habitat management. The alternative proposes to address and solve resource problems rather than allowing negative situations to remain unchanged. Specifically, features of the alternative which should benefit the wildlife/rangeland resource include:

- Maximation of the use of Allotment Management Plans. New AMPs will be developed and existing ones will be implemented.

- Protection of degraded riparian habitat

- Implementation of watershed management plans

- Use of range improvements to better distribute livestock

Although many features identified under the Preferred Alternative have the potential to improve the condition of the resources, certain areas of the DRMP/EIS could be strengthened. They are as follows:

- Add the riparian area management recommendations from Alternative D into the Preferred Alternative. This would maximize riparian habitat protection on the East Walker River. We feel this river is one of the best areas in western Nevada to fish.

- Management of wild free-roaming horses and burros can reduce opportunities for management of wildlife. The Nevada Chapter of The Wildlife Society has developed a position statement regarding the management of wild free-roaming horses and burros within Nevada. A copy of the position statement is attached.

We are opposed to the establishment of a National Burro Range as proposed within the Preferred Alternative.

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A total of $35,000 in expenditures for habitat improvements for horses and burros is proposed in comparison to $36,950 proposed for wildlife habitat improvement (Table 2, pages 5-8).

With the exception of Alternative A, the other alternatives also include disproportionately large expenditures for improvement of wild horse and burro habitat in comparison to wildlife. We feel that this imbalance of wildlife habitat improvement funds needs to be resolved.

The Nevada Chapter of The Wildlife Society appreciates the opportunity to comment on the Walker River Resource Area DRMP/EIS.

Sincerely,

Robert Mason

Robert Mason
Chairman - Conservation
Review Committee

Comment Letter 31

Union Geothermal Division
Union Oil Company of California
2099 Range Ave., P.O. Box 6854
Santa Rosa, California 95406
Telephone (707) 542-9543

UNION

Vincent J. Signorotti

January 23, 1985

Bureau of Land Management
District Manager
Carson City District
1050 East William, Suite 335
Carson City, Nevada 89701

Gentlemen:

Thank you for the opportunity to comment on the Resource Management Plan for The Walker Resource Area.

Union Oil Company is one of several companies actively exploring for geothermal resources in areas outside The Walker Resource Area, but in close proximity to the area boundary. Specifically, in recent years, The Dixie Valley area of Churchill County has seen significant geothermal exploration including extensive geophysical surveys and well drilling activities. The level of activity and results of exploration varies by company; however, it is becoming evident that this area may encompass extensive geothermal resources. As a result of these activities, the BLM has issued many geothermal leases and is continuing to assess the potential for geothermal development in this vicinity. Included in their comprehensive framework for future management of these public lands is the issue of transmission corridors for electrical generation.

It is our understanding there are presently two companies with rights-of-way applications on file with the BLM impacting portions of The Walker Resource Area. In your capacity as the lead surface management agency it is very important that you recognize the need for transmission corridors and to plan accordingly. The Draft Walker Resource Management Plan does recognize this need and identifies several proposed routes.

At this point in our exploration at Dixie Valley and other areas in western Nevada, Union is unprepared to recommend one transmission corridor over another. However, we strongly encourage The Bureau of Land Management to provide for future geothermal development in The Walker Resource Management Area by provicing sufficient transmission corridors to accommodate this important source of energy.

Comment Letter 31

Bureau of Land Management
January 23, 1985

Again, thank you for taking time to consider our opinion on this matter.

Very truly yours,

Vincent J. Signorotti

Vincent J Signorotti

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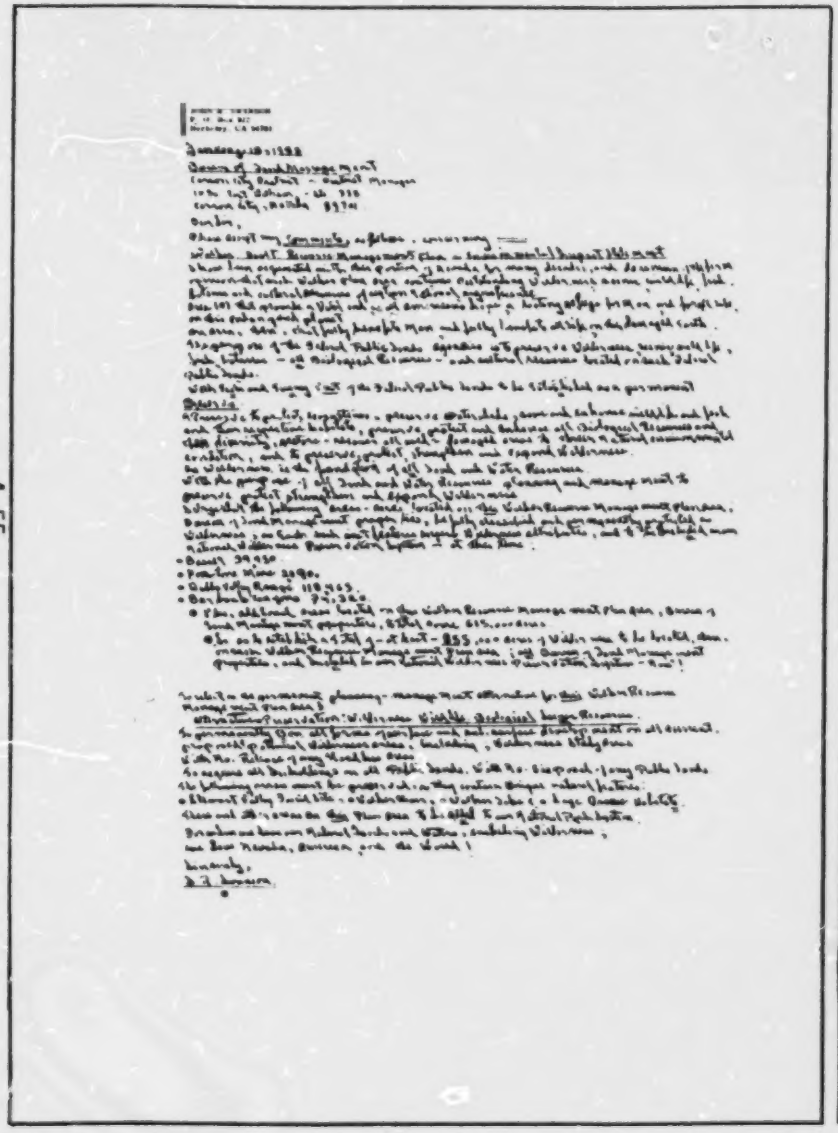
Comment Letter 32



Comment Letter 33

STATE OF NEVADA

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

January 25, 1985

Mr. Tom Owen, District Manager
Carson City District Office
Bureau of Land Management
1050 E. William Street
Carson City, Nevada 89701

Re: Governor's Consensus Position, SAI NV #85300020

Dear Mr. Owen:

The State of Nevada has reviewed the Draft Resource Management Plan and Environmental Impact Statement for the Walker Planning Area, and has developed the following position with respect to the wilderness study areas.

There are two wilderness study areas in the Walker Planning Area: The Burbank Canyons (NV-030-525A) and the Gabbs Valley Range (NV-030-407). Under the Bureau's preferred alternative, both areas would be recommended as not suitable for wilderness designation. The State concurs with this recommendation.

With respect to the Burbank Canyons Wilderness Study Area, in the Pine Nut Mountains, we note especially the existing roads, private inholdings, and the extensive mining activity along the borders of the area. Historical activity has included considerable mining of silver and gold, with some copper mining activity. We also note the geothermal potential along the eastern boundary of the Wilderness Study Area near Hind's (Nevada) Hot Springs.

The Gabbs Valley Range Wilderness Study Area is also heavily mineralized. This area is noted for past production of mercury, gold, lead, copper and tungsten. There are presently more than 300 mining claims in the Wilderness Study Area, most of which have been staked in the last five years. Other human intrusions into the Wilderness Study Area include roads, private inholdings, and livestock developments.

Comment Letter 33

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While both areas include scenic resources of considerable value, neither appears suitable for wilderness designation.

Thank you for the opportunity to review and comment on this study. Please feel free to contact us if you need additional information about either of these areas.

Sincerely,

Linda A. Ryan
Director

LAR/11

4-56

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Division of State Lands

January 24, 1985

Thomas J. Owen, District Manager
Carson City District
Bureau of Land Management
1050 East William Street, Suite 335
Carson City, Nevada 89701

SUBJECT: Comments on Draft Walker Resource Management Plan and EIS

Dear Mr. Owen:

Alternative B, the preferred alternative, represents a good balance between resource protection and resource use. The selected plan should be based on the preferred alternative.

We are pleased to see that both Burbank Canyons and Gabbs Valley Range are not being proposed as wilderness areas in this alternative. Resource use potentials and other conflicts seem to greatly outweigh the limited wilderness values present in each area. In addition, Mineral County is on record as strongly opposing any wilderness areas within their county.

The withdrawal proposed for the Stewart Valley Area of Critical Environmental Concern appears to be reasonable and acceptable. The paleontological values in Stewart Valley seem to warrant the additional controls that may be developed in an ACEC. Mineral withdrawals for key areas would seem appropriate. The total amount of land to be withdrawn should be determined as the ACEC management plan is developed; however, 1,280 acres does not seem to be extreme at this time.

We feel that wild horse numbers may be too high for much of the area, but are confident that monitoring will confirm this, resulting in appropriate reductions in time. The proposed Burro Sanctuary appears to be a reasonable proposal if adequate management of burro populations, in accordance with resource capabilities, is applied.

Thank you for the opportunity to comment.

Sincerely,

Mike Del Grosso
Land Use Planner

JMD:jd

cc: John Walker, State Clearinghouse

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Comment Letter 33

STATE OF NEVADA
DEPARTMENT OF WILDLIFE
1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 789-0500

WILLIAM H. BRYAN
Governor

WILLIAM A. MOLINI
Director

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OFFICE OF
COMMUNITY SERVICES

January 15, 1985

Ms. Linda A. Ryan, Director
Office of Community Services
State Clearinghouse
1100 East William, Suite 109
Carson City, NV 89710

Dear Linda:

We appreciate the opportunity to review the draft Walker Resource Management Plan and Environmental Impact Statement produced by the Carson City District of the BLM. Our staff has carefully reviewed the document with regard to wildlife values. We offer the following comments and suggestions.

The intent of the Walker Resource Management Plan seems to be to maintain current livestock and wild horse/burro numbers and monitor range condition. The results of monitoring would be used to adjust stocking rates. We question whether reasonable numbers of wildlife and other objectives can be achieved under the proposed RMP. Our specific concerns are discussed below.

SPECIFIC COMMENTS

Rangeland Management

33-1 The DEIS states that forage condition on the planning area is 72 percent low quality, 2 percent high quality, and 26 of 41 allotments show a stable trend. No allotments are shown with an upward trend. The document also states that 69 percent of the planning unit receives slight to moderate use, 14 percent receives heavy use, and 8 percent severe use. This data appears to be contradictory. If 69 percent of the planning unit is receiving light to moderate use, how can you have 72 percent low forage quality and no upward trending allotments?

The preferred alternative calls for current stocking rates for livestock and a 10 percent reduction in horses and burros. The Nevada Department of Wildlife's management recommendations (Walker-Mina Planning Units Input Report, 1978) called for closing several key deer winter ranges to grazing in order to allow recovery of the range and lessen competition. Such actions will help to reach the Department's goals of reasonable numbers of wildlife. We would prefer a reduction of horses and burros to 1971 herd levels and

Response Letter 33

33-1 The determination of forage quality was based upon the desirability of the range plants being grazed by livestock. Forage quality does not reflect the ecological condition or seral stage of a plant community. Low forage quality is common in a low precipitation, saltbush desert type which covers much of the planning area. Also, vegetation in this desert type is slow to show a change in trend due to several factors, but primarily due to poor soil conditions and a lack of precipitation.

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Response Letter 33

33-2 areas, and in some areas, a reduction of stocking rates. We do not support the Marietta National Wild Burro Range. The range is in direct conflict with NDOW's proposed bighorn sheep reintroductions in the Excelsior Mountains. Conflicts between burros and bighorn sheep are well documented in Death Valley. Bighorns generally lose out in those conflicts.

The DEIS states that there are 50 riparian zones in the Walker planning unit that are heavily utilized. Most are shown as being in poor condition. The preferred alternative proposes to improve 10.7 miles of fishable streams and improved protection for 27 riparian areas. We would prefer to see a greater level of protection and improvement than that offered. Alternative D more closely approaches our desired level of improvement and protection of riparian areas in the planning unit.

33-3 We disagree with some allotment categorizations as presented in the DEIS. We believe that several allotments that are proposed for "C" categorization have significant wildlife conflicts and potential for positive economic return on public investments if managed more intensively for wildlife. We request that Four-Mile, Risue, Saroni Canal, Topaz and Wild Oat allotments be placed in the "I" category. We believe that each of these allotments has a significant season-of-use conflict with wildlife.

33-4 With respect to the issue of positive economic return on public investment, we offer the following economic analysis of wildlife values in Mineral County. Table 1 (attached) presents the economic valuation of consumptive use of wildlife in Mineral County during 1983. The analysis uses the Wildlife/Fishery User Day (WFUD) values that have been generated by the U.S. Forest Service. These values are generally viewed as conservative. The result suggests that Mineral County's wildlife resources have an economic value approaching $1,000,000 per year. The DEIS suggests that wildlife only contributes about $57,000 to the local economy annually. Table 2 (attached) presents data on the estimated economic impact of wildlife to the economy of Mineral County in 1983. Our estimates are based on values of average annual expenditures for sport hunting and fishing that were generated by the U.S. Fish and Wildlife Service (1980 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, Nevada). The values are in 1980 dollars, except for the furbearer results. The values for fur harvest are based on average 1983 fur market pelt prices for each species listed. The results of this analysis suggest that approximately $400,000 per year are input into the Mineral County economy by consumptive use of wildlife. Because of difficulties in estimating nonconsumptive use of wildlife, we have not included that in our analysis. However, U.S. Forest Service manuals recommend assigning nonconsumptive use days equal to consumptive user days for purposes of benefit-cost analysis, and assigning a WFUD value of $29. Clearly, that would increase the economic value of wildlife by a significant proportion. It is our belief that these data clearly demonstrate that management of the public lands for wildlife can show a positive economic return on public investment.

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33-2 A wild burro designated range is established for the protection and preservation of wild burros in an area suitable for management of a self-sustaining wild burro herd. Designation would provide a vehicle by which BLM could improve burro management in the Marietta area. This designation would not preclude reintroduction of bighorn sheep into the Excelsior Mountains. The area of overlap would be limited to a few water sources in the canyons of the Excelsior Mountains. These natural waters could be protected from burro use and available to bighorns. Water is available for burro use away from the spring source and bighorn use area. Artificial waters could also be developed for bighorns in areas away from burro use areas.

33-3 The allotment categorization process identifies priorities for establishing range improvements and intensive livestock management. Analysis by Carson City District Staff indicates a higher priority for such actions in those allotments in the "I" category. That analysis indicated wildlife conflicts on the allotments listed by the commentor (Draft RMP/EIS, Appendix D, Table 1), however those conflicts were not sufficient to justify an "I" categorization.

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The categories in the Draft are not permanent. The allotments in question will continue to be monitored. As new information becomes available, we may reassess individual allotment categories in an open public process. It should also be noted that the placement of allotments in the "C" category does not preclude management to reduce conflicts. The Carson City District would welcome cooperative efforts with the Nevada Department of Wildlife to improve habitat management on those allotments.

33-4 The analysis in the Draft is not intended to portray the overall economic benefits of wildlife to the economy of the RMP area. It is limited to the contribution of wildlife on public lands to the local economy. It is further limited to only those species projected to be impacted by the proposals in the RMP. This is in conformance with Council on Environmental Quality regulations which require that descriptions of existing conditions be no longer than is necessary to understand the effects of the proposals (40 CFR 1502.15). It would be inappropriate to include an analysis of the economic benefits of species such as rabbits when no significant impacts are projected.

Furthermore, the commentor's analysis is based on a mix of user day values, gross expenditures, and fur prices.

Response Letter 33

Such an analysis is inappropriate. The most meaningful measurements of regional economic impact are income and employment (U.S. Bureau of Economic Analysis, 1977). Since the analysis in the Draft is based on those measurements, no revisions are warranted.

It should be noted that analysis by Carson City District staff indicates that positive economic returns can and are being obtained from public land wildlife habitat management as evidenced by the fact that most of our wildlife related benefit cost (B/C) analyses have yielded positive B/C ratios.

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Land Tenure and Rights-of-Way Corridors

33-5 Lands identified for disposal in the draft RMP are not presented clearly enough for adequate assessment of values. Many of the parcels appear to be of concern and interest to the Department. Private development of land in and adjacent to crucial wildlife habitat can have significant negative impacts on wildlife. We recommend that the current document not be used as a device to clear those lands for disposal. Each parcel should be dealt with on a case by case basis as they become available for disposal.

If we can answer questions or provide further comments, please let me know.

Sincerely,

Willie

William A. Molini
Director

FRK:RL:pw

Attachments

cc: Region I

33-5 The Walker RMP does not identify specific parcels for disposal - only general areas where disposals would be considered. However, the areas identified in the Preferred Alternative/Proposed Resource Management Plan have been screened to eliminate areas where private development would conflict with wildlife management. Disposals will be dealt with on a case by case basis as suggested. Input from the Department of Wildlife will be requested throughout the disposal process.

Comment Letter 33

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TABLE 1

ECONOMIC VALUES OF WILDLIFE IN MINERAL COUNTY
(1983 CONSUMPTIVE ONLY)

	USER DAYS	WFUD (USFS)	TOTALS
BIG GAME			
Mule Deer (Management Area 20)	1,978	$23.10	$45,691.80
Antelope (Management Area 20)	44	$23.10	$1,016.40
Mt. Lion (Management Area 20)	16[1]	$23.10	$369.60
SUBTOTAL	2,038		$47,077.80
UPLAND GAME			
Grouse	84	$26.80	$2,251.20
Quail	240	$26.80	$6,432.00
Dove	729	$26.80	$19,537.20
Chukar	649	$26.80	$17,393.20
Rabbit	1,028	$26.80	$27,550.40
SUBTOTAL	2,730		$73,164.00
WATERFOWL			
Ducks/Geese	2,048	$32.00	$65,536.00
FISHERIES			
East Walker[2]	7,775	$17.85	$138,783.75
West Walker[2]	7,930	$17.85	$141,550.50
Rough Creek	73	$17.85	$1,303.05
Red Canyon	214	$17.85	$3,819.90
Walker River	1,094	$17.85	$19,527.90
Walker Lake	22,597	$17.85	$403,356.45
SUBTOTAL	39,683		$708,341.55
TOTALS	46,499		$894,119.35

[1] Estimated at two days per cat harvested

[2] Lyon County

TABLE 2

DIRECT FINANCIAL INPUT OF HUNTING AND TRAPPING
TO THE LOCAL ECONOMY

FURBEARERS	HARVEST	1983 AVERAGE VALUE/PELT	TOTAL VALUE
Beaver	3	$7.43	$22.09
Bobcat	105	$233.34	$24,500.70
Gray Fox	57	$32.02	$1,825.14
Coyote	273	$36.56	$9,980.88
SUBTOTAL	438		$36,328.81

SPECIES	NO. HUNTERS	TAG DEMAND	AVE ANNUAL EXPEND/ HUNTER	EXPENDITURES
BIG GAME				
Mule Deer (Mge. Area 20)	314 Res. Tags	3,220	$391.32	$122,874.48
Antelope (Mge. Area 20)	10 Res. Tags	53	$391.32	$3,913.20
Mt. Lion	70 Hunters		$391.32	$27,392.40
SUBTOTAL				$154,180.08
SMALL GAME	622		$196.00	$177,576.00
WATERFOWL	284		$146.89	$41,716.76
SUBTOTAL				$219,292.76
TOTAL				$409,801.65

Comment Letter 33

Response Letter 33

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4-62

RICHARD H. BRYAN
Governor

STATE OF NEVADA

ROLAND D. WESHERGARD
State Historic Preservation Officer

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY
201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710
(702) 885-5138

January 14, 1985

MEMORANDUM

TO: John Walker, Office of Community Services

FROM: Alice M. Becker, Staff Archeologist Alice M Becker

SUBJECT: DRAFT WALKER RMP/EIS, SAI NV #85300020

The Division has reviewed the referenced document. We were disappointed that cultural resources or specific archeological/historical properties were not singled out for attention as an issue. A number of important sites have been discovered in the Walker Resource Area, such as the Pistone Site near Black Mountain and Teel's Marsh near Marietta. We realize BLM's interest and obligation in protecting these resources. However, the Division strongly urges the BLM to set a timetable for the nomination of properties to the National Register, in accordance with Section 3a of Executive Order 11593, and to commit funds for their preservation through data recovery or some other form of protection. 33-6

Regarding compliance, the Walker RMP/EIS should address the potential effects of various actions for each alternative or historic properties in general. The plan/EIS must contain a statement that BLM give due consideration to properties listed on and eligible for inclusion in the National Register, referencing Section 106 of the National Historic Preservation Act of 1966, as amended. 33-7

If there are any questions concerning these comments, please ask BLM staff to call us.

AMB/da

33-6 Cultural resources were not identified as an issue because existing management was determined to be adequate. It would not be appropriate to establish a timetable for National Register nominations since funding levels and program priorities vary from year to year. The Carson City District will continue its commitment to identifying and nominating properties to the Register and will continue to commit funds for their preservation through data recovery or other appropriate means on a case by case basis.

33-7 Please refer to page 2-27 of the Draft which outlines BLM's responsibilities for cultural resources management under various laws including Section 106 of the Natural Historic Preservation Act.

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Comment Letter 33

NEVADA DEPARTMENT OF TRANSPORTATION

A. E. STONE
Director

TRANSPORTATION BOARD
RICHARD H. BRYAN, Governor, Chairman
BRIAN MCKAY, Attorney General
DANIEL N. DANIELS, State Controller

STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION
1263 SOUTH STEWART STREET
CARSON CITY, NEVADA 89712

October 26, 1984

IN REPLY REFER TO

John Walker, Senior Planner
State Clearinghouse Program
Office of Community Services
1100 East William Street, Suite 109
Carson City, Nevada 89710

PRD 7.19

Dear John:

The Nevada Department of Transportation has reviewed the environmental assessment for SAI NV #85300020 draft Walker RMP/EIS.

Based on the information submitted, we have the following comments on the proposed project:

Please notify this agency should any fencing be constructed adjacent to or intersecting a state interest highway.

Thank you for the opportunity to review the project.

Sincerely,

JAMES O. BARRY
Assistant Director
Planning

DOB:JTM:bb

Comment Letter 33

RICHARD H. BRYAN
Governor

STATE OF NEVADA

RICHARD L. HEVELONE
Director

DEPARTMENT OF MINERALS
600 W. King Street, Suite 108
Carson City, Nevada 89710
(702) 885-5000

January 9, 1985

THOMAS J OWEN
District Manager
Bureau of Land Management
1050 E William St - 325
Carson City, NV 89710

The Nevada Department of Minerals appreciates the opportunity to review and comment on the Draft Resource Management Plan and Environmental Impact Statement for the Walker Resource Area (SAI NV #85300020).

The department agrees with your recommendation that both WSAs should be considered nonsuitable for wilderness designation. For clarification purposes, please find listed below our specific comments on each Wilderness Study Area identified in the Walker Resource Area.

GABBS VALLEY RANGE

The Gabbs Valley Range WSA consists of 79,600 acres in eastern Mineral County. The area is noted for past production of mercury, gold, lead, copper and tungsten. The following mineral resources and claims are discussed:

Poinsettia Property This mine is located in T. 11 N., R 33 E., and was noted for mercury discovered in 1929. In this area, cinnabar occurs in high grade lenses and veinlets near a fault zone in Tertiary chalcedony, gypsum, sulfur and clay.

Ball Bearing Manganese Property This prospect is located at the north end of the WSA. There are about two dozen mining claims located there.

(Luning) Santa Fe District Copper and silver ore were discovered in the southern area of the WSA in 1879. The major production of greater than $2 million was during World War I. The deposit occurs in contact metamorphic deposits associated with tactite developed from limestone in the Upper Triassic Luning Formation. In the north end of the district, contact metamorphic deposits have yielded lead and tungsten (as schaelite) during and after World War II. Ventures West Minerals, Ltd. drilled out an orebody containing 4.87 million tons of 0.084 oz/ton gold and 1.26 oz/ton silver in a location 2 to 5 miles south of the WSA boundary (Smith, 1983).

There are currently greater than 300 claims in the WSA, most of which have been staked in the last five years.

- 1 -

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BURBANK CANYONS

The Burbank Canyons WSA comprises 13,395 acres in eastern Douglas County. The area contains limey medisediments of Jurassic-Triassic age and porphyritic and non-porphyritic quartz monzonites and granodiorites of Cretaceous age. The following mineral resources and associated mining claims are discussed:

Longfellow Mine This mine is 9 miles northwest of the town of Wellington in the southern Pine Nut Mountains, near Red Canyon. The area was discovered in 1862, and contains gold, galena and chalcopyrite (with pyrite and specular hematite) in quartz veins cutting Cretaceous quartz monzonite.

Washoe Claims These claims are south of the Longfellow mine about one mile. Gold occurs in east trending quartz veins cutting quartz monzonite.

Lucky Bill In this area, fractured quartz veins contain argentiferous (silver bearing) galena, stibnite, pyrite and chalcopyrite. The area is due north of the WSA and has produced 23 tons of high grade silver-lead-zinc ore.

Red Canyon Claims These claims are located in limey medisediments within rocks of Jurassic-Triassic age. It was discovered in the early 1900s with copper, pyrite, chalcopyrite and pyrrhotite being present in contact metamorphic rocks. Greater than $100,000 of production has been noted during this time (approximately equal to $1 million current market value).

San Juan-El Capitan Mine This mine is currently productive for gold and is located in Section 11, T. 11 N., R. 23 E.

Wellington (Silver Glance) District The South Camp (or Mountain Gold) claims are within the southern end of the WSA. This set of cla... is located in quartz veins cutting monzonite near dikes of quartz monzonite porphyry and andesite.

In addition, geochemical work by Dixon (1971) showed anomalous traces of copper and zinc mineralization in the northern section of the WSA. Also, a high potential for geothermal resources occurs along the eastern boundary of the WSA. This is due to the nearby proximity of Hind's (Nevada) Hot Springs to the east of the WSA, with hot spring waters ranging from 142°F-144°F and two wells with 117°F water. There are no known petroleum resources in the area.

As a closing statement, the Nevada Department of Minerals does value preserving some public lands for future generations and scientific study, as long as the mineral industry, which is so essential to our national defense and the state's progressive economy, can remain healthy and be provided the opportunity to pursue new mineral resources.

Richard L. Hayburn
Executive Director

RLR:wf

Comment Letter 34

Response Letter 34

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SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

January 24, 1985

Tom Owen, Manager
BLM/Carson City District
1050 E. William #335
Carson City, NV 89701

Dear Manager Owen,

On behalf of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club, I am submitting the following comments on the draft Walker RMP/EIS:

Scoping - The Sierra Club submitted extensive comments in Step 1 of the planning process. We appreciate the revisions which we requested which were made in the alternatives. Several of our suggestions were not acted on and no explanation was given for BLM's dismissal of them. We appreciated receiving a copy of the planning criteria, but have not yet received a copy of the AMS which we requested at the same time. Has an AMS been developed? Is it available to the public? Does it have to be requested under FOIA? Please advise us of the answers to these questions.

34-1

Despite the changes made in the alternatives based on scoping, in our review of this draft RMP/EIS, we find both procedural and substantive inadequacies. Since the document incorporates part of the Reno MFP/EIS, due to the overlapping of planning units and resource areas, we would also like to incorporate by reference our comments on the draft Reno MFP/EIS into these comments, especially since the Sierra Club is currently seeking judicial relief for the inadequacies of the Reno plan. We are particularyly dismayed by BLM's casual assignment of other resource values to the "implementation" section of Chapter 2. We restate the question we raised in our scoping comments "Isn't the RMP supposed to be the broad management plan guiding BLM activities for the next 10-20 years? If so, it must include more than the proposed abbreviated list of resource values, or it is not going to be adequate as a guide to public land decision making." This procedure violates multiple use management requirements.

34-2

Preferred Alternative

Rangeland Management - The issue which we raised was livestock overgrazing. The preferred alternative proposes to "do nothing and monitor" rather than to take any active steps to end overgrazing, not withstanding the requirements of law. The DRMP/EIS adequately documents the scope of livestock overgrazing, but declines to do anything about the problem, except study it.

34-3

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P.O. Box 19777
Las Vegas, Nevada 89119

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GREAT BASIN GROUP
P.O. Box 8096
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Reno, Nevada 89507

34-1 The commentor is apparently referring to the Management Situation Analysis (MSA). Since the MSA is an internal document, no extra copies have been reproduced for public distribution. The document is available for review, however, at the Carson City District Office or a copy may be obtained upon payment of reproduction costs.

34-2 The Walker RMP/EIS has been prepared in conformance to the BLM planning manual 1616 and the Council on Environmental Quality (CEQ) regulations for preparing EISs. Manual 1616 provides for focusing the RMP on significant resource issues rather than attempting to cover all resources. This procedure maximizes the efficiency of the planning process. CEQ regulations state that Federal agencies shall discuss "...only briefly issues other than significant ones" (40 CFR 1500.4(c)). Therefore the Walker RMP/EIS analyzes significant issues such as wilderness in detail and discusses less significant issues such as forestry only briefly.

34-3 After extensive consultation and research, the BLM has concluded that a combination of monitoring data and baseline vegetation information is the most accurate and equitable data base to be used in determining proper carrying capacities. If data obtained in the monitoring process along with existing baseline information indicate that adjustments in livestock numbers are necessary, such adjustments will be made

Comment Letter 34

Response Letter 34

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4-66

The DRMP/EIS fails to disclose how much data is or is not currently available on which to base decisions on adjusting livestock numbers to the carrying capacity of the area. We request that the FRMP/EIS disclose the amount of existing data, both from inventory and from monitoring which is currently available, as well as how much more data BLM deems necessary before adjusting livestock numbers. We also challenge the categorization of grazing allotments which we will discuss in our comments on Chapter 3. This proposed management action violates the requirements for sustained yield management.

34-4

Wilderness - We object to the non-recommend tion of any wilderness in the preferred alternative, which is supposed to be "balanced." In particular, we object to the omission of the a positive recommendation for the Gabbs Valley Range WSA, because roads constructed in violation of the Interim Wilderness Management Regulations are apparently now being used illegally by BLM to disqualify the WSA. Detailed comments on this issue will be submitted in other Sierra Club comments.

34-5

Land Tenure and ROW Corridors - The acreage identified for disposal in the preferred alternative is still excessive. In addition, the DRMP/EIS is still not clear that any such lands should first be offered to other federal, and state and local governments, before being made available for sale. The 217 miles proposed for ROW corridors is still excessive. In our scoping comments we specifically asked whether the ROW were designated and, if not, why the RMP/EIS should not analyze whether the ROWs should be granted and whether facilities built without ROW permits should not be removed if they occur in sensitive areas. We again request that this concern be addressed in the FRMP/EIS.

34-6

34-7

ACECs - We support the objectives and management actions for ACECs in the preferred alternative.

Chapter 3 Affected Environment

Watershed - The Sierra Club strongly supports BLM's proposals to protect watershed and riparian areas.

Wildlife - We find BLM's wildlife proposals to be very deficient, both in terms of population and in terms of wildlife habitat rehabilitation, protection, and enhancement. Reducing livestock numbers to the carrying capacity of the range would probably be the most effective way of improving wildlife habitat. Protecting riparian areas would be next in importance, and facilities such as a few guzzlers, etc., would be a poor third.

34-8

Vegetation - The Sierra Club has stated often our opposition to BLM's categorizing livestock allotments into its M I C key-mouse system in lieu of taking any decisive action to end livestock overgrazing. Notwithstanding our general opposition, we specifically object to the MIC categorization of allotments in this planning area. The overgrazing problems identified in Table 3-3 are not reflected in the table on categorization in Appendix

3

through consultation with interested parties, including the livestock operator.

34-4 All available data pertaining to range in the Walker planning area was used in the Draft. The most current inventory was a Phase I Watershed Conservation and Development Inventory which was completed in 1974 and is discussed on page A-7. All the monitoring data from grazing utilization studies, vegetation trend study plots, and rental grazing use records were used in compiling Table 3-3 on page 3-8 through 3-10.

The monitoring program will be continued using those guidelines established in the Nevada Rangeland Monitoring Handbook. The amount of information needed to make adjustments, if any, will be determined on an individual allotment basis.

34-5 The roads constructed in violation of the IMP Regulations were not used by this agency during any evaluation of the wilderness qualities of the Gabbs Valley Range. The roads were examined by a special study team in February - March 1981. Appropriate measures were taken at that time to mitigate the situation.

A number of factors related to mineral interest, extension of existing operations, mineral potential, quality of the scenic value, and wilderness characteristics resulted in the recommendation of nonsuitability for this WSA.

111.

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34-6 Other Federal, state, and local agencies will be provided ample opportunity for input to any land disposals. Requests by such agencies for lands will be evaluated on a case by case basis.

34-7 The designation of right-of-way corridors does not mean that applications for rights-of-way within the corridors will automatically be approved. Each application will be analyzed in detail. Any sensitive areas within the corridors will be avoided. Facilities constructed without right-of-way permits are evaluated on a case by case basis to determine if they should be removed. This evaluation includes an analysis of impacts on sensitive areas.

34-8 Please refer to response 34-3.

34-9 D, Table 1. Table 3-3 shows livestock overgrazing (heavy and severe utilization from 27% to 71%) in 19 of 41 allotments. Yet, only 6 of these overgrazed allotments are in the I or improve category. 5 are in the M or maintenance category, although M allotments must meet the following criteria: present range condition is satisfactory and/or improving, present management is satisfactory, the allotment has moderate to high resource production potential, and there are no, or very limited, resource or land use conflicts, etc. 8 overgrazed allotments are in the C or custodial category and must meet the following criteria: present range condition has stabilized or is not a major factor, present management appears satisfactory, the allotment has low resource production potential, and resource or land use conflicts are limited, etc. We do not feel overgrazed allotments are in satisfactory condition nor is the present management satisfactory, and there definitely is a conflict with the requirements of good range management. The categories in the FRMP/EIS should be revised to reflect the overgrazing problems identified in Table 3-3.

34-10 In addition, notwithstanding the legal requirements of FLPMA, the use of "livestock forage condition" instead of studies showing ecological conditions in the Walker DRMP/EIS is a giant step backward for BLM to the days of dominant livestock use of the public lands, and a telling demonstation of the lack of multiple use as a meaningful management and planning objective for the Walker RA.

34-11 Wild Horses and Burros - We support the completion and implementation of WHMPs, as well as the designation of Marietta Wild Burro Range. Horse use must also be reduced to the carrying capacity of the range, but we strongly object to BLM removing wild horses and then permitting livestock to replace the captured horses.

34-12 Recreation - The document is deficient is planning for recreation, the most prevalent and valuable resource in this area. While we support BLM efforts to protect and better manage fisheries, the lack of efforts to improve wildlife habitat with resulting negative impacts on both hunting and non-consumptive wildlife values and the negative wilderness recommendations with resulting negative impacts to backcountry recreation demonstrate BLM's lack of commitment to improving management of this valuable resource.

Land Tenure - See comments on the preferred alternative.

Economic Conditions - This section convincingly illustrates the general unimportance of livestock grazing to the county economies. The analysis of Alternative E reveals that totally eliminating livestock use of the public lands would result in less than a 1% change in employment and in average income. The analysis of the economic value of recreation is seriously deficient.

3

34-9 All but one of the M and C allotments referred to by the commentor are grazed primarily in the dormant growing season (winter). The exception is the McBride Flat allotment in which wild horses were responsible for the heavy utilization. The herd in this area is managed by the Forest Service. They have recently removed a number of horses and will continue to monitor and adjust the herd to proper grazing levels.

Those allotments grazed during the winter may be grazed at levels higher than allotments grazed in other seasons since most species are dormant. Nevertheless, those allotments will continue to be monitored to determine if grazing use should be adjusted. Furthermore, the proposed categories are not permanent. They can be adjusted if additional monitoring and analysis indicates a change is warranted.

34-10 Livestock forage condition was used in the Walker RMP since data on ecological condition was not available.

34-11 The Proposed RMP contains no provisions for replacing wild horses with livestock.

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Comment Letter 34

34-13 Social Conditions - This analysis overemphasized the anti-wilderness feeling of local residents and livestock permittees and made no reference to the pro-wilderness attitudes of urban residents who live near this planning area, as well as to the generally positive feelings toward wilderness of the rest of the country.

34-14 Chapter 4 Environmental Consequences - This chapter is also seriously deficient. This analysis would have the reviewer believe that removing 100% of livestock (in Alternative E) would produce the same percent of change in forage condition - 3% - as the level of use proposed in the preferred alternative (which is 34% over good range management levels of 55% utilization). At least the measure of erosion does show a significant reduction from the elimination of grazing. This whole chapter is a pro-forma exercise with little serious attention to the analysis of environmental impacts of the management proposals in the various alternatives. It does, however, indirectly support our contention that the range of alternatives is deficient, since the impacts of the management actions in those alternatives are not significantly different.

In short, we find this document to be procedurally and substantively inadequate. We know that we can't realistically expect BLM to revise the FRMP/EIS to comply with the requirements of FLPMA and PRIA, unless national policy changes or we file a court suit to force the agency to comply with its laws. But, being more optimistic than realistic, we will once again request that BLM revise this planning document to develop a reasonable range of alternatives which will result in the elimination of overgrazing in the Walker RA, ASAP, not sometime in the hazy future when BLM has "enough" data, and the proper management of all the multiple uses of the public lands in the Walker RA, that BLM adequately analyze these alternatives to learn and tell the public of their impacts on the environment, and lastly, to design a preferred alternative which will continue to permit all the multiple uses of the public lands with minimal negative impacts to the environment. This type of pro-forma document does a disservice to the professional BLM employees who are well-trained and committed to good resource management as well as to the public which has entrusted the agency with the responsibility for proper multiple use and sustained yield management of our public lands.

Sincerely,

Rose Strickland

Rose Strickland, Chair
Public Lands Committee

4-69

Response Letter 34

34-12 Recreation was not determined to be an issue for the Walker RMP since existing management is adequate. Current management includes developed facilities at Wilson Canyon and Walker Lake. The Walker Lake site is among the most heavily used recreation areas in the State. The Proposed RMP will improve recreation quality by improving wildlife and fishery habitat; protecting rivers, streams, riparian areas and springs; establishing the Marietta Wild Burro Range; establishing the Burbank Canyons Scenic Area; and expanding the East Walker River Scenic Area.

34-13 Please refer to Pages 4-11, 4-26, 4-43, 4-58 and 4-64 of the Draft RMP/EIS. These pages analyze the social impacts of the various proposals on regional and national as well as local communities.

34-14 The long term level of use proposed in the preferred alternative is within proper grazing use levels. The 3% figure referred to is only a general overall figure developed for display in a summary table. The analysis of impacts in Chapter 4 was proposed on a detailed, allotment specific basis. As the analyses on pages 4-13 and 4-60 indicate, the impacts to forage condition are significantly different on an allotment by allotment basis.

Comment Letter 35

Response Letter 35

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4-70

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

720 Brookfield Drive
Reno, Nevada 89503
January 24, 1985

Tom Owen, District Manager
Carson City District, BLM
1050 East William St.
Carson City, NV 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft Walker RMP and EIS.

I feel that the preferred alternative must be improved in several ways in order to become a viable document for the best management of the land and all its resources. First the "no wilderness" recommendation is totally unsatisfactory. Even Alternative C with an "emphasis towards production of commercial resource uses" recommends 9970 acres of wilderness in Burbank Canyon and 27,860 acres in the Gabbs Valley Range. There seems to be little resource or private land conflicts according to this recommendation. Presumably a "balanced" preferred alternative would adopt this as a lower limit for a wilderness recommendation.

I have read the Walker Wilderness Technical Report which was sent to me after the public hearing by a member of your staff and find that many of the statements in this report tend to downgrade the wilderness quality of the two WSA's and indeed of all Great Basin type wilderness candidates. For example, on Page 42 the statement is made that "when compared to other Great Basin landscapes the area (Burbank Canyon) contains good scenic quality." It is exactly this kind of thinking that has kept the Great Province so under-represented in the National Wilderness System. It is implied that no one would care to hike in Burbank Canyon with the Sierra Nevada so close except when the latter is under deep snow. This is like comparing Mexico and Alaska. The small size of the WSA is also cited as a reason for no wilderness. Since the suitable area is twice as large as the minimum 5000 acres and since there are canyons and good vegetative screening, this scarcely seems a valid criticism. I myself have hiked in the Burbank Canyon WSA and consider it a prime candidate for wilderness in the Carson City District.

35-1

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35-1 Criteria for evaluating the WSAs did not include comparisons with other areas. Rather, manageability, conflicting interests and resources were the influencing factors which resulted in the recommendations of nonsuitability.

Comment Letter 35

Response Letter 35

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

Tom Owen, District Manager
1/24/85. Page 2.

I support entirely the Alternative D recommendations for ACEC's in both Stewart Valley and along the East Walker River. The paleontological resources in Stewart Valley are invaluable and need to be protected from ORV misuse and "wildcat" collectors. The East Walker is an important wildlife and fishing resource and has already been degraded by inappropriate ORV use. It also needs the protection of ACEC designation.

35-2 As I stated in my testimony at the December 4th Public Hearing, I fail to understand why there has not been an ecological condition survey completed in the Walker Planning Area since there are obviously many problems. Such a survey needs to be done immediately before intelligent management decisions can be made. However, the statistics that are given, particularly with respect to riparian areas, are alarming. On Page 3-13 it is stated "protected and ungrazed areas are in good condition and most heavily grazed riparian areas are in a poor condition class." Riparian areas are a precious resource in this arid country, particularly for wildlife, and your statistics show that these areas have been grossly mismanaged. Your preferred recommendation should state that all riparian areas should be restored to good condition as soon as possible by protecting them from grazing use.

35-3

I am also concerned with the plight of the antelope as described on Page 3-20 and of the sage grouse whose habitat is obviously disappearing as wet meadows are being degraded. These situations should be addressed immediately in your management plan.

35-4 I hope that the Final EIS will correct these obvious deficiencies in wilderness, wildlife, and riparian area management and that you will be able to put together a really "balanced" preferred alternative that puts proper emphasis on these important resources. Please send me a copy of your final EIS.

Sincerely,

Marjorie Sill

Marjorie Sill, Chairperson

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Las Vegas, Nevada 89119

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35-2 During the inventory assessment phase of the Walker RMP process it was determined that existing inventories were sufficient for the preparation of the RMP. It should be noted that the RMP proposes an extensive rangeland monitoring program to systematically gather additional data on which to base future range management decisions.

35-3 The Proposed Resource Management Plan continues the Carson City District's commitment to protect key riparian areas. Ten of these areas have already been protected. The RMP provides for the protection of an additional 27 riparian areas/spring sources.

35-4 Both sage grouse and antelope habitat conditions are expected to improve due to implementation of the Preferred Alternative/Proposed RMP. Specific proposals include water development and protection of riparian areas. In the long term actions such as balancing livestock use to carrying capacity and improving livestock distribution and season of use would improve habitat conditions for antelope and sage grouse.

Comment Letter 36

COMMUNITY DEVELOPMENT
DEPARTMENT

Planning
Engineering
Building & Safety
Regional Transportation

January 25, 1985

Mr. Thomas J. Owen
Carson City District Manager
Bureau of Land Management
Department of the Interior
1050 East Williams St., Suite 335
Carson City, NV 80701

Re: Draft Resource Management Plan and Environmental Impact Statement for the Walker Planning area.

Dear Mr. Owen:

36-1 In regard to the above referenced document, Douglas County would support any RMP alternative that would continue to reserve the right of the county to review, for local approval, all public land resource management proposals on a case by case basis. Of particular importance to Douglas County are issues of land tenure and right-of-way corridors.

Sincerely,

John Renz
Community Development Director

Response Letter 36

36-1 The Proposed RMP continues the provisions for local government review and input to all public land resource management proposals, including land tenure and rights-of-way proposals.

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Comment Letter 37

January 24, 1985

Mr. Tom Owen
Carson City District Manager
1050 East William Street, Suite 335
Carson City Nevada 89701

Re: Draft Resource Management Plan and Environmental Impact statement for the Walker Planning Area

Dear Mr Owen

In regard to the above referred document I would strongly urge that you adopt Alternative D of the five RMP alternatives presented. I feel that this plan would represent the wisest and best multiple use management of the public lands within the Gabbs and Walker Planning Units while fairly representing the needs of all people who recreate and utilize the resources of these lands.

Sincerely,

Juan F. Guzman
P.O. Box 7644
So. Lake Tahoe, Ca. 95731

Peter N. Mancuso
Box 523
Minden, NV 89423

Dave Mello
Box 1862
Main, NV 89423

Comment Letter 38

DAVID A. HORNBECK
ATTORNEY AT LAW
LICENSED IN NEVADA AND CALIFORNIA

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AREA CODE 702
TELEPHONE 322-0077

January 25, 1985

HAND DELIVERED

Thomas J. Owen
District Manager
Carson City District
Bureau of Land Management
1050 East William Street
Suite 335
Carson City, Nevada 89701

Re: Draft Walker Resource Management Plan
and Environmental Impact Statement

Dear Mr. Owen:

My comments are directed to your proposed Resource Plan and EIS as they pertain to the two (2) WSAs in the Walker Resource Area, the Gabbs Valley Range WSA (NV-030-407) and the Burbank Canyons WSA (NV-030-525a).

Gabbs Valley Range WSA (NV-030-407)

As a result of the Intensive Inventory, 79,600 acres of the Gabbs Valley Range unit were designated a WSA. In the WSA Decision document, released November 15, 1980, the Gabbs Valley Range WSA was described in glowing terms. It stated, for example, that the "size and shape of the unit along with topographic and vegetative screening contribute to an outstanding opportunity for solitude.", "Excellent opportunities for hiking, horseback riding, hunting, sightseeing, camping, and nature appreciation in the unit constitute an outstanding opportunity for a primative and unconfined type of recreation.", "Wildlife, wild horses, scenery, and limited cultural resources are in the unit." The unit was described as having topography that "varies from alluvial fans with very little relief on the outer edges of the unit, to mountainous peaks and canyons. Vegetation also varies from desert scrub and extensive pinyon woodlands to willows and aspen trees along moist drainage.". The only slightly negative note was that "14 miles of ways and three spring developements were

-1-

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Comment Letter 38

documented which are not substantially noticeable." (emphasis added).

These observations about the unit are borne out by my personal observations of the Gabbs Valley WSA, both on the ground and from the air. Even in the Draft Walker RMP at page 3-37, the opportunities for solitude are cited as "outstanding" and the numerous recreational opportunities are noted. In addition, "a significant archaeological site", apparently discovered during the study phase, is mentioned.

The only ostensible rationale for not recommending this outstanding area for wilderness designation appears in the last paragraph of the Draft EIS, which states:

> "Several problems exist for managing this unit as a wilderness. The unit is surrounded by ongoing mining activity, penetrated and transected on all sides by cherry-stemmed roads and ways and range improvement projects. There is a continued interest in developing the mineral values of the area. The private inholdings further complicate this manageability problem (Table 3-9)."

The alleged "manageability problem" of the WSA is specious. This becomes obvious when one refers to the "Special Study: Gabbs Valley Range" which was produced by the BLM in 1981 as a result of illegal road building within the WSA authorized by the Mineral County Commissioners. Your letter of February 23, 1981, makes it clear that the road building was "not authorized".

38-1 The "ongoing mining activity" alluded to as a management problem is all outside the WSA. Furthermore, the Special Study points out that "There are no claims recorded in this area and based on the available information, grandfathered uses and valid existing rights are not an issue here." (Emphasis added). Thus, the "continued interest in developing the mineral values of the area" also cited is not relevant as any claims that may be made would be post-FLPMA.

Response Letter 38

38-1 The special study cited was concerned solely with the impact of the unauthorized road construction, not with the suitability of the area for designation as wilderness. It did not identify eight unpatented mining claims in T. 10N., R. 33 E., Section 26. However, because the intent of the study was to analyze and evaluate the impact of the unauthorized roadwork on wilderness suitability, that oversight is irrelevant. Moreover, the study's observation that "...grandfathered uses and valid existing rights (were) not at issue here" was intended solely as a peripheral element in consideration of that roadwork. The statement should not be cited out-of-context to suggest that no grandfathered uses existed within the WSA boundaries on the date of designation of the Gabbs Valley Range WSA.

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The "private inholdings" cited consist of one 40 acre site which has no road access, and is apparently undeveloped. Exchange of such property would seem the more logical management alternative to eliminating all wilderness.

38-2 Finally, we are left with the "problem" that the WSA is "penetrated and transected on all sides by cherry-stemmed roads and ways and range improvement projects.". An examination of Map 3 of the Special Study and a comparison of it with the roads and ways depicted on the wilderness alternatives maps in chapter two of the Draft EIS reads that the use of these roads and ways to create "management problems" borders on the fraudulent.

Referring to the Interim Management Policy (IMP), it should be noted that under the non-impairment criteria "Any temporary impacts authorized by the BLM under these criteria will be ignored during this wilderness study," (IMP, p. 11). Clearly any impacts not authorized by BLM should likewise be ignored. Furthermore, the IMP provides under its enforcement provisions: "If unauthorized activities result in surface disturbance or other degradation of the area's suitability for preservation as wilderness, legal action will be initiated as appropriate to obtain full restoration of the area. Impacts resulting from unauthorized activities will not disqualify an area from WSA status." (IMP, p. 16).

For these reasons, I urge you to include the Gabbs Valley Range WSA as recommended wilderness.

Burbank Canyons WSA (NV-030-525a)

Based on my personal experience within this WSA on numerous occasions of leading groups of people on day hikes, the problems expressed in the drafted EIS concerning management of that area as wilderness are unrealistic. The presence of ongoing mining activity on the peripheries of the WSA in no way degraded its value as wilderness. The existence of those activities and the mining haul road in Red Canyon were so distant as not to affect the wilderness experience even when viewed from the ridge.

-3-

4-75

38-2 The special study states that illegal road building activity occurred in the Gabbs Valley WSA in 1981. This activity consisted of upgrading existing ways to roads and blading new roads. Since that time a number of additional previously existing roads and ways have been identified through public input and analysis of aerial photographs taken prior to the illegal road building activity. The maps in the Draft and the Wilderness Technical Report display roads and ways as they were before the illegal activity occurred. None of the new roads are included and they were not considered in the No Wilderness recommendation in the Preferred Alternative/Proposed RMP. It should be noted that once the county was informed that their activity was illegal and would have no effect on the status of the WSA, they ceased operations and have cooperated fully with the BLM by blocking access to the new roads.

Comment Letter 38

This outstanding area should definitely be designated a wilderness.

Very truly yours,

DAVID A. HORNBECK
Personally and on behalf of
The Wilderness Committee,
Toiyabe Chapter of the Sierra Club

DAH/dc

-4-

Comment Letter 39

Ed Spang,State Director
Bureau of Land Management
P.O.Box 12000
300 Booth St.
Reno,Nevada 89520

Mr. Spang,

My comments on the Walker Resource Management Plant, Wilderness Study Area are, for the lack of a better proposal, I must agree with your office's recommendations.
I do not understand some of the terminology, but that is not unusual, as I rarely understand bureaucratic lingo. The other plans are all extremely unreasonable. Almost all of them would hinder and oppress almost every segment of the public, except perhaps a few enviornmentalists backpackers, and etc. Your preferred plan seems very logical and well prepared and the acreage you recommend for withdrawal should definitely be designated wilderness. The other proposals seem to have only one intent and that is to lock up acres no matter the consequences to the public and the future.

Respectfully,
William D. Roberts

Box 94
Battle Mountain,Nevada 89820

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Comment Letter 40

January 22,1985

Department of Interior
Bureau of Land Management
State Director
300 Booth St.
P.O.Box 12000
Reno,NV 89520

Dear Mr. Spang,

I am writing to endorse the Bureau's recommendations for the Walker Resource Management Plan. Your preferred plan is the most balanced of any of the other proposals offered.

However, I do have a question. I tried to establish the answer before I wrote you with my endorsement. The person I talked to on the local level did not know. The call I placed to the state office was not returned. My question is what is the difference between withdrawn and segregated? i.e. "11,000 acres already withdrawn from mineral entry" and "3,587 acres segregated from mineral entry". I would appreciate a reply as this information will enable me to offer more comprehensive comments in the future. Thank you.

40-1

Sincerely,
Coxie Roberts
Coxie Roberts
285 So.Galena #21-8
Battle Mountain,NV 89820

Response Letter 40

40-1 Withdrawn from mineral entry refers to the withholding of public lands from entry under the mining laws. Segregated from mineral entry refers to the removal of public lands from entry for a limited period under the mining laws.

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Comment Letter 41

Response Letter 41

UNITED STATES GOVERNMENT

Memorandum

FISH AND WILDLIFE SERVICE
GREAT BASIN COMPLEX
4600 Kietzke Lane, Bldg. C
Reno, Nevada 89502

TO: District Manager, Bureau of Land Management, Carson City, Nevada

DATE: January 24, 1985

FROM: Acting Complex Manager, Reno, Nevada

SUBJECT: Comments on the Draft Walker Resource Management Plan and Environmental Impact Statement, Walker Resource Area

We have the following comments and recommendations regarding the subject Plan and Environmental Impact Statement:

1. For Alternative B, we are assuming that the 27 riparian areas recommended for protection are currently heavily grazed. On Page 3-13 of the Resource Management Plan (RMP) 50 riparian areas are said to be heavily utilized by livestock at present. We recommend that as many as possible of these 50 areas be protected from heavy grazing. Protection measures should include either complete fencing of the riparian areas with adjacent livestock water troughs, or partial fencing with livestock access to isolated stream reaches. It should be noted that fencing may only be necessary for a few years at a time in some locations.

2. Although Alternative C is geared towards production of commercial uses, we recommend that at least 27 of the 50 currently heavily grazed riparian areas be protected against livestock grazing using the measures discussed above.

3. The East Walker River is one of the more outstanding remaining natural river systems in the Great Basin (Page 3-39 of RMP). It supports riparian habitat and a sport fishery. We recommend that 4,300 acres along this river be designated as an Area of Critical Environmental Concern (ACEC) and withdrawn from mineral entry.

41-1 4. On Page 4-17 of the RMP it was noted that, for Alternative B, 3 miles of fishable rivers and creeks would remain unprotected. Why is this the case? We recommend that these 3 miles be protected from livestock grazing.

41-2 5. Alternative B, which should provide for an optimum mix of natural and commercial resource uses, recommends no Wilderness Study Areas (WSAs) as suitable for designation. Alternative C which is oriented towards production of commerical resources recommends 39 percent of the total acreage of WSAs for wilderness designation. Why are there no WSAs recommended for designation in Alternative B?

As noted on Page 4-17 of the RMP the non-designation of the Burbank Canyons WSA could have a major negative impact on fisheries hab in Red Canyon Creek which supports a population of brook trout. We recommend that the entire 13,395 acres of this WSA be recommended as suitable for Wilderness designation

41-1 Under current livestock management a total of 10.7 miles of fishable rivers and creeks need protection. An additional three miles do not currently need protection.

41-2 No WSAs were recommended for designation in Alternative B because it was determined that other values were higher than wilderness values and that both areas have existing or potential manageability problems.

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to protect the fishery and associated riparian habitat from the effects of mining activities. We also support establishment of the Gabbs WSA for Wilderness designation; however, it is assumed that since grazing will continue, wildlife management activities and development will also continue in the WSAs.

41-3 6. Provisions of Alternative E are for a 10% decrease in wild horse and burro numbers and elimination of all livestock grazing. Correspondingly, it would be expected that wildlife habitat would be managed for more than the recommended 41% increase over current levels. This is the same level as for Alternatives B & D which would be managed to include livestock grazing. Please explain this apparent discrepancy.

The preferred Alternative B appears acceptable provided that the above-discussed provisions regarding riparian habitat (Items 1, 3, 4, and 5 above) are included in the Final Resource Management Plan and Record of Decision.

Thank you for the opportunity to comment.

Robert J. Fallon

CC: Nevada Department of Wildlife, Reno and Fallon, Nevada

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Response Letter 41

41-3 Alternative E proposes to manage wildlife habitat for the population levels which were developed jointly by the Nevada Department of Wildlife (NDOW) and BLM. If this alternative were implemented it is likely that NDOW and BLM would adjust these levels upward.

Comment Letter 42

Response Letter 42

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RESOURCE CONCEPTS INC
ENGINEERING · ECONOMICS
RESOURCE PLANNING

BUR OF LAND MANAGEMENT
CARSON CITY DIST OFFICE
JAN 25 3 08 PM '85

January 25, 1985

Mr. Thomas J. Owen
District Manager
Bureau of Land Management
1050 E. William Street
Suite 335
Carson City, Nevada 89701

SUBJECT: N-3 State Grazing Board Comments to the Draft Walker RMP

Dear Mr. Owen:

Resource Concepts, Inc. (RCI), representing the interests of the N-3 State Grazing Board, provides the following comments to the Draft Walker RMP. The N-3 State Grazing Board requests an answer to each specific question and a response to each recommendation presented in this letter.

WILD HORSES

- If Alternatives A, B, or E were implemented, the Bureau would be managing three wild horse herds at 1979 levels and three herds at the 1983 levels. Apparently, these proposed management levels are based solely on whether or not a horse herd was inventoried in 1983. However, these horse herds have grown substantially since these inventory dates. For example, the Garfield Flat Herd inventory of 1979 was 245 head, the 1983 inventory indicated 585 head, and the 1984 estimate is 665 head. Obviously, the 1,174 head of horses and 129 head of burros do not represent current numbers within the Resource Area.

42-1 Question: Is it reasonable to assume that current wild horse and burro numbers (as of January, 1985) are much greater than the 1,174 head of horses and 129 head of burros portrayed in the "Affected Environment" section of the RMP?

Question: Is the proposed use of 1979 and 1983 numbers as opposed to <u>current</u> wild horse and burro numbers inconsistent with Instruction Memorandum No. NV-82-305?

42-1 There is some evidence that wild horses and burros have increased. However, the information presented in the Affected Environment section is based on the most current information at the time the Draft RMP was prepared. This is not in conflict with Instruction Memorandum No. NV-82-305.

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42-2 Question: If the No Action Alternative (Alternative A) represents continuation of the present management situation, how is the Bureau justified in proposing management of wild horse and burro herds at 1979 and 1983 inventory levels?

- Page 2-4, regarding the Preferred Alternative, states that to "Initially manage wild horses and burros in current herd use areas at present estimated levels . . . would yield a level of 1,174 horses and 129 burros." The RMP does not state that the initial management level will be 1985 wild horse and burro numbers.

Question: In reality, does the BLM actually intend to manage wild horses and burros at their 1979 and 1983 levels under the preferred alternative, or was this for "analysis purposes only"?

Question: If initial management levels of the 1979 and 1983 inventories are for "analysis purposes only" what will be the actual management levels of the individual wild horse and burro herds during the short term if Alternative B is selected?

- The BLM's Wild Free-Roaming Horse and Burro Program Guidance requires that the "appropriate management level" be established in the land use plan. This issue was not specifically addressed in the RMP.

Question: How will the appropriate management levels of wild horse and burro herds be determined?

- Page 4-18, referring to the preferred alternative, indicates that the initial population levels to be managed for would be 1,174 horses and 129 burros and that future adjustments will be minor. This is an alarming statement. The Bureau assumes that these numbers are compatible with the multiple use objectives of the appropriate allotments. The only significance of these numbers is that they represent 1979 and 1983 inventories. The fact that these numbers were counted from an airplane have little bearing as to their appropriateness with regard to proper range management.

Question: Has the BLM "pre-set" the final management level of wild horses in the preferred alternative without regard to monitoring data, the BLM Program Guidance, to the present conflicts acknowledged in Appendix D, Table 1, CRMP, etc.?

Response Letter 42

42-2 In Alternative A, management of wild horses and burros would be at the levels presented in the Draft RMP. In Alternative B, the level of wild horses and burros as presented in the Draft RMP, would initially be managed for. Those wild horse and burro numbers and current livestock numbers would be used as a starting point. As stated on pages 2-19 and 2-20 of the Draft RMP, "Future adjustments in livestock and wild horses will be based on consultation with interested parties and an analysis of data from monitoring studies".

The Proposed RMP in this document is a variation of Alternative B. It proposes an interim management level in the Garfield Flat Allotment of 364 head rather than the 585 head proposed in Alternative B. This new level has been based on additional data obtained since the Draft was prepared.

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Bureau of Land Management
January 25, 1985
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42-3 The BLM has previously documented that wild horses on the Garfield Flat Allotment have been responsible for the over-utilization of forage prior to livestock turnout for a number of years. It is already known that 585 head of horses are excessive on the allotment. Yet, the BLM insinuates that these numbers will not be in need of reduction in the future if the preferred alternative is selected as the final RMP. This statement is based on predictions that condition, trend, and productivity will remain static. However, the RMP also states that declines in forage condition, trend, and productivity would result from continued overutilization and improper periods of use.

Question: How did the Bureau predict that the Garfield Flat Allotment would remain in static trend, when it is already known that wild horses are overgrazing the allotment prior to livestock turnout and that a significant amount of this use occurs during the critical growing season?

Question: Why is it predicted that the Garfield Flat Herd Use Area will remain in a static trend under Alternative D, when it advocates increased utilization during the critical growing season?

AVERAGE UTILIZATION

42-4 There are six allotments in excess of 55 percent average utilization as opposed to five, as portrayed on Page 3-11.

42-5 The 1981 Nevada Rangeland Monitoring Procedures (NRMP) does not advocate averaging utilization results for an entire allotment as is alluded to on Page 3-11. The 1981 NRMP Allowable Use Factors were presented as guidelines only and for individual plant groups.

42-6 The NRMP does not recommend a "55% average utilization" for all species for all seasons of use as is portrayed in the RMP. The NRMP presents a 55 percent Allowable Use Factor as a guideline only when perennial grasses under a yearlong season of use are being considered. Unless all of the allotments portrayed in Table 3-3 experience season long grazing and unless all of the species averaged are perennial grasses, then the statement regarding "55% average utilization" has little bearing.

Table 3-3, regarding the heading of "% Utilization 3 Year Average", should be clarified to indicate that the utilization results represent all users. The table in its present form insinuates that only livestock are responsible for these

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42-3 Please refer to response 29-2.

42-4 Please refer to Chapter 3 of this document.

42-5 The Draft RMP does not state that the Nevada Rangeland Monitoring Procedures advocate averaging utilization levels. The analysis in the Draft uses average utilization only as part of a broader discussion of utilization patterns. Page 3-11 of the Draft specifically states that such figures do not reflect areas of concentrated use.

42-6 The Nevada Rangeland Monitoring Procedures recommend utilization levels on key species (perennial grasses and forbs) of from 50 to 60 percent. These are meant "...as a guideline only and should be tempered with local judgement on a case by case basis" (emphasis added) (Nevada Range Studies Task Group, 1974). Carson City District Staff determined that for the purposes of the Walker RMP that 55% was the proper level for analysis, particularly given the limited nature of available data.

It should be noted that the Proposed RMP initiates no immediate adjustments in livestock grazing. Any adjustments will be based on additional data collected through the rangeland monitoring program.

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42-7 results. For example, on the Garfield Flat Allotment livestock AUM demand represents only 29 percent (3,574 AUMs) of the total forage demand, wild horses 57 percent (7,020 AUMs), and mule deer 14 percent (1,774 AUMs). The table incorrectly attributes all of the utilization to cattle on the Garfield Flat Allotment.

42-8 Question: Were the utilization data that were averaged for each allotment gathered at the same time of the year?

TREND

42-9 NEPA requires the BLM to "identify any methodologies used" and when "there are gaps in relevant information or scientific uncertainty, the agency shall always make clear that such information is lacking or that uncertainty exists".

Question: How was trend determined on Page 3-4 and how certain is the BLM of its accuracy?

ALTERNATIVE B

42-10 Pages 2-1 and 2-4 state that Alternative B provides for a mix of uses based on their relative value.

Question: How was the "relative value" of the various uses determined? Please provide a ranking of the uses in order of the BLM perceived importance as used in this RMP.

The Bureau's analysis of Alternative B's environmental consequences relative to livestock grazing is inappropriate for the following reasons:

42-11 1. The Nevada Rangeland Monitoring Procedures does not propose that 55 percent utilization of current year's growth be representative of proper use regardless of species or season of use. If the allowable use factor guidelines presented in the NRMP were correctly applied, then the Parker Butte Allotment would not be deserving of reduction as portrayed in Appendix C, Table 2, since 60 percent utilization of perennial grass during a fall/winter season of use is considered proper use.

Question: If the preferred alternative includes livestock AUM reductions for allotments where average use exceeds 55 percent, why are AUM increases not given for allotments which show less than 55 percent average use? (Eight allotments in Table 3-3 are shown to have less than 30 percent average utilization.)

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42-7 Nowhere on Table 3-3 is it stated or insinuated that livestock are responsible for total utilization. However, for clarification purposes a footnote has been added to the table.

42-8 Yes.

42-9 Trend studies were conducted in accordance to standard BLM procedures in effect during the study period as outlined in BLM Manual 4412.22(c). This manual is available for review at the Carson City District Office. The accuracy of these studies was determined to be sufficient for analytical purposes in the RMP. These studies were taken over a minimum of three years and a maximum of eleven. Each allotment had a minimum of two trend study plots, up to a maximum of eight.

42-10 No such arbitrary across the board values were used in the development of Alternative B. Relative values were used only on a case-by-case site specific basis in the development of each individual proposal in Alternative B.

42-11 Please refer to response 42-6.

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42-12 2. Average utilization figures are often misleading. As stated in Stoddart, Smith, and Box (1975), "Unfortunately, utilization has been used to express two things: 1) the use of the range unit as a whole, and 2) . . . Except in general terms, the former usage is confusing and should not be used, although it occurs in older range literature".

42-13 3. The utilization data presented in Table 3-3 represents all users, not just livestock. However, the BLM is attempting to adjust only livestock. This does not appear to be an appropriate approach for an alternative which advocates "balanced use". Reducing livestock use only based on the existing utilization would be a more suitable analysis approach for the Resource Protection Alternative (D) as was done in the Reno EIS.

Hopefully, this approach was used only for "analysis purposes" and that it does not represent intended course of action. While this approach may have been for analysis purposes only, the Bureau is still obligated to exercise "professional and scientific integrity".

42-14 Question: In reality, does the Bureau propose livestock adjustments based upon allotment-averaged utilization given in Appendix C, Table 2?

ALTERNATIVE E

- Designation of wilderness areas, by law, does not preclude livestock grazing.

42-15 Question: If the assumption was made that elimination of livestock grazing was conducive to the "all wilderness" alternative, why wasn't the management action of elimination of wild horse and burro grazing evaluated?

42-16 Question: What does the Bureau feel the economic ramifications of eliminating livestock grazing would be in regard to the Code of Federal Regulations' requirement for complete financial compensation to the livestock operator for range improvement expenses incurred?

42-12 The full quotation from Stoddart, Smith and Box (1975) is as follows:

"Unfortunately utilization has been used to express two things: (1) the use of the range unit as a whole, and (2) use made of plant species individually. Except in general terms, the former usage is confusing and should not be used, although it occurs in older range literature. Under the second usage, utilization is defined as the degree to which animals have consumed the total current production, expressed in percent." (emphasis added)

It is under this second usage that utilization figures were obtained for the Draft RMP/EIS. Allotment wide utilization figures are used only in general terms and are displayed in Table 3-3 only in conjunction with more specific data on the percent of each allotment in each utilization category.

42-13 Alternative B proposed no initial adjustments in livestock grazing. Initial adjustments were proposed only for wild horses.

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ECONOMICS

42-17
- The discussion on ranch budgets (Page 3-47 and Table 3-14) should acknowledge the fact that as of January 1, 1984, maintenance costs for all range improvements on BLM lands will be borne by permittees. As ranch budgets were derived in 1982, this additional and potentially significant cost should be acknowledged. The ranch budgets included in Appendix G and summarized on Table 3-14 should be adjusted to reflect added costs for maintenance of range improvements.

- The text states that de facto market values reflect the additional capacity that public land grazing allotments provide to base property, and is a result of grazing fees that have historically been less than fair market value (Page 3-49).

42-18
In contrast, because of agency imposed commensurability requirements, it can be argued that federal AUMs have no value to the permittee until certain levels of private investment are made in base land and water. Permit value is in part a reflection of the permittees' opportunity cost associated with investments in base land and water as necessary to satisfy commensurability requirements.

42-19
- Tables 1 and 2 in Appendix C suggest that new levels of preference will be established based upon a three year *average* of actual use levels per allotment. While this approach may be valid in some cases, in others it may rob a good operator of opportunities or potential for which the operator has sacrificed to create. For example, low beef prices coupled with high costs of production may have limited a permittee's ability to purchase enough animal units to run at preference. However, if in the near future beef prices escalate, increasing borrowing power and the ability to stock up, preference will have been reduced and his opportunity diminished. Many permittees may have exercised self reductions in numbers to prevent overgrazing as a result of uncontrolled increases in wild horse numbers. A reduction in preference further penalizes an operator who has voluntarily practiced good range management.

It is recommended that initial levels of preference be established on a case by case basis following consultation with each individual permittee. This approach has been adopted in the Schell Resource Area of the Ely District.

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42-14 Please refer to response 42-2.

42-15 No such assumption was made. Please note that the vast majority of the area (95%) precluded from livestock grazing is outside Wilderness Study Areas.

42-16 The "No Grazing" proposal in Alternative E was included for analytical purposes only to determine the impact of livestock removal on range resources. Since such a proposal is precluded by the Taylor Grazing Act, the Federal Land Policy and Management Act, and the Public Rangelands Improvement Act, it is questionable whether current grazing regulations regarding compensation would apply.

42-17 Livestock permittees in the Walker RMP area have always provided maintenance of public land range improvements though cooperative agreements with the Carson City District. Therefore no adjustments in the budgets are needed.

42-18 Permit values are based on the number of AUMs and the characteristics of public land grazing allotments. They are the result of grazing fees that have historically been less than fair market value. The value of improvements on private base lands is included in the market value of those private lands. It should be noted that the Bureau recognizes no legal right to grazing privileges or their de facto market value.

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42-20 Both Tables 1 and 2 in Appendix C suggest that preference levels may be reduced by 40 to 50 percent. Since existing permittees purchased permits at stated levels of preference, this could represent significant impacts to rancher equity. Using Table 2, Appendix C, as an example, reducing preference from 64,107 to 36,768 would reduce ranch equity by approximately $956,865 (at $35 per AUM). The impact under Alternative A would be even greater.

Reductions in ranch equity to these magnitudes may cause ranch lenders to call existing loans, as debt to equity ratios rise to unacceptable levels. This could cause ranch owners to begin selling base property which could further reduce the rancher's need for BLM provided forage. The permittee's ability to maintain range improvements may be challenged. Permittees may not be able to secure necessary financing to allow continued operation.

42-21 Table 2, Appendix C, indicates that an overall increase in forage production of three percent will occur, yet a net AUM result of 36,768 is actually less than the three year average of 36,962. This appears to conflict with the discussion on Page 4-24, under Livestock Ranching, which indicates that in the long term, grazing capacity will increase.

Although total forage production may increase, available forage for livestock will decrease both in the short term as well as in the long term. The economic analysis under Alternative B should be modified to reflect this.

In conclusion, the N-3 State Grazing Board appreciates the opportunity to comment to the Draft Walker RMP. Hopefully, these comments will result in improvement of the document.

Sincerely,

John L. McLain, Principal
Certified Range Management Consultant

JLM:lf
cc: N-3 State Grazing Board Members

42-19 No such adjustments are suggested or proposed for the Preferred Alternative or Proposed RMP. Please refer to response 42-6.

42-20 These tables project long term livestock use, not changes in preference. Current livestock use levels do not equal preference and there is no reason to expect this to change in the future. Changes in ranch equity are analyzed in Chapter Four of the Draft on pages 4-11,4-25, 4-41, 4-56 and 4-67.

42-21 Table 2, Appendix C displays projections of livestock use, not forage production. These projections are accurately analyzed in the economic analysis for Alternative B.

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Comment Letter 43

January 24, 1985

Mr. Thomas J. Owen
District Manager, B.L.M.
1050 East William St., Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

Please include for the official record the following comments on the Draft Resource Management Plan and Environmental Impact Statement (INT DRMP/EIS 84-56):

I feel that I am uniquely qualified to comment on the issue of wilderness in Nevada as I am a member of every responding special interest group except ranching. I am a professional geologist with work experience with the U.S.G.S. (field mapping); Hanna Mining (base and precious metal exploration); Humble Oil and Refining Co., now Exxon (geophysics). I have also been president of my own mining company, Phoenix Mineral and Mining Associates, for ten years. That company successfully carried out precious opal mining operations at Virgin Valley, Humboldt Co., Nevada for two years as well as base and precious metal exploration and property evaluation in Nevada, Alaska, and elsewhere. During the opal mining operation we had the largest mining operation in Humboldt County according to the Nevada Bureau of Mines. I feel that I am familiar with much of Nevada because of these activities.

I consider myself a conservationist, but I also do considerable field collecting of rocks and minerals and am deeply involved with regional and national rock hound organizations. I have two bad knees which prohibit extensive field work, so I cherish my ability to drive my car like an ORV into the most outlandish areas. (I've gone farther than some motorcycles and pulled jeeps out of bogs.)

Finally, my parents had three lots on Assateague Island which were taken by the U.S. Government for the National Seashore there with what I still consider to be woefully inadequate compensation. There is absolutely no question, however, that the area has been put to a much better use as a National Seashore than had it been developed in cottages. I thoroughly enjoyed my subsequent visit there.

Possibly I have written far too much about myself, but I am going to propose some things for which I thought it best to state my qualifications. The most important is that I love Nevada very much and would consider it an honor to live there. Virtually everyone I spoke with in the area also cherishes the place, but most, in fact, are so familiar with it that they do not appreciate the uniqueness of the environment in which they live. In time, I think that they and their children will thank you for saving some portion in a degree of wilderness. The designation of Wilderness Areas seeks to preserve exactly those elements of the environment that we all cherish, whether we be ranchers, miners, rockhounds or "conservationists" (whoever they are).

I would concur that the three key management issues are important and should be dealt with. There are really four issues since land disposals and utility right of way corridors are actually separate issues. In fact, all four issues are essentially separate and distinct from one another within the allowable framework of existing laws and regulations. There is no useful purpose in lumping these together unless aggravation and fanning fear and prejudice are considered useful goals. As a particularly glaring example

4-87

Comment Letter 43

43-1 I would cite the lumping of a NO GRAZING ON ANY PUBLIC LAND and ALL WILDERNESS together in Alternative E. First, the no-grazing scenario is currently illegal and not an option under the current Taylor Grazing Act. Yet repeatedly the BLM has raised this specter to arouse fear in the ranching community. The no-grazing scenario covers the entire resource area. The ALL WILDERNESS scenario applies only to two relatively small WSAs. Grazing rights in WSAs or wilderness areas are guaranteed by law and BLM regulation. The only purpose in linking these unrelated issues is a negative one -- namely to foment friction and distrust between several constituencies of the BLM. This is not a proper function of government, which should rather serve to facilitate interaction between citizens. Each issue of the four should have its own set of alternatives developed without the introduction of passions of unrelated issues. This is true because as currently presented the only thread of commonality of the issues is that the BLM has to decide something about them. It should decide them separately on their own merits.

Question: Why are the four issues not treated separately?

As the two areas have WSA status, it may be presumed that they meet the minimum wilderness characteristics. Loss of these outstanding wilderness values through non-designation represents a significant adverse impact. Decisions regarding suitability or non-suitability of an area for designation as Wilderness "will be justified" on the basis of [Wilderness] Planning Criteria (Walker Wilderness Technical Report - WTR p. 1). Each criterion and quality standard will be fully considered and documented in determining suitability (Lahontan DRMP/EIS p. 7-28). In my opinion the rationale for the preferred alternative, namely a recommendation of non-suitability for both areas has neither been documented nor justified.

43-2 All things considered, with the exception of one issue, the preferred alternative (B) appears in fact to be the balanced mid-range approach sought. The excepted issue is that of "Wilderness." There is no balance in no wilderness!

BLM has alleged three significant conflicts in each of the two WSAs. These are 1) with "moderate" mineral potential in broad areas of each WSA; 2) with a high degree of mining interest in terms of current claiming and prospect development; 3) intrusive ways permitting ORV abuse.

43-3 The summary of the GEM report given in the WTR and DEIS is grossly inadequate. The reader is given NO information as to the localized geology in either WSA. On presumed lode claims the reader is given no information as to the metals sought or if any are actually present on the claim. In fact, from reading the summaries it could be inferred that no one even covered the ground to see what was there.

As to the assertion of moderate (let alone high) mineral potential for broad areas of each WSA, one needs to critically examine the definition (DEIS p. G-1). The geologic environment need only consist of being in the hills or mountains as opposed to the intermontane basin.

43-4 The inferred geologic processes or hydrothermal emplacement, contact replacement, or regional metamorphism of syngenetic deposits can be widespread without leading to any economically significant concentrations of metals. None of these processes (or any other) is specifically claimed to be present within a WSA. They just might be. A reported mineral occurrence is just that. Someone reports (often erroneously) that there is a particular mineral present. In and of itself this has absolutely no economic significance for production. Mineral occurrences do not make mines. Moderate potential for a mine requires a known mineral deposit, i.e., large enough reserves of sufficient

43-5 grade to warrant extraction at a profit or near a profit. The way the definition reads, all the hills and mountains (as opposed to the intermontane valleys) would have moderate potential. What we need is how the area of the WSA compares with the adjacent area, and similar areas regionally, nationally, and world-wide with respect to potential production. In the "summary" not a single comparison is given nor a specific ore mineral named. We

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Response Letter 43

43-1 Three, not four issues were analyzed in the Draft. Land tenure and rights-of-way corridors were logically combined as one issue since they both relate to public land realty management. The three issues were not "treated separately" since each is part of an overall comprehensive resource management plan alternative.

The no grazing alternative was included at the request of the conservationist community (including the Sierra Club and the National Resource Defense Council) for analytical purposes only. The Draft does not state or imply that livestock grazing is precluded in wilderness areas, in fact it clearly states tnat livestock grazing would continue in wilderness areas (Page 2-20).

43-2 Several alternatives were examined and discussed as to which would provide the best management strategy for the issue involved and all the contingent resources. If the alternative does not appear mathematically "balanced" that is because it is not. It is merely the most logical, reasonable and suitable for providing the highest quality of management for the entire area and its resources.

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43-3 In some cases, the preparers of the GEM reports relied on personal experience in the field of mineral resources, information supplied by claimants, published and unpublished geologic data, and other research materials rather than on field verification. Within the constraints of the projects' guidelines, it was not deemed necessary nor economically practical to examine each claim or to engage in localized studies of geology. Analysis of existing data led to delineation of areas of mineral potential (favorability) conditioned on varying degrees of confidence. These data and analyses are verifiable.

43-4 The preparers of the GEM reports analyzed available data and delineated areas having certain favorability for economic mineralization. They further assigned levels of confidence to each of these determinations. The confidence levels were based on such data as known mineral occurrences, known deposits, etc. While other, different, criteria might have been used to estimate the mineral potential (eg. "Moderate potential...requires a known mineral deposit."), the GEM report's authors felt the system they used to be a satisfactory method for portrayal of their conclusions.

43-5 Where it was deemed relevant, the GEM report's authors did, in fact, examine some of the geologic attributes of lands adjacent to the WSAs in reaching their conclusions about the favorability for mineralization within the WSAs. It was believed to be redundant to reiterate those analyses simply to justify the GEM conclusions. Moreover, comparisons of WSA mineral potentials with national and world-wide potentials was not within the scope of the WTR document.

Comment Letter 43

are merely told that it appears that gold and silver are regionally the primary metallic target. In short, there is no information given at all which is of any practical use. Without this sort of documentation there is no justification for using this alleged moderate mineral potential to offset wilderness values.

43-6 Question: Why was a better summary not given, or better yet why was the GEM report omitted from the WTR?

43-7 BLM Allegation: The Gabbs Valley Range contains a large area on the south side with moderate mineral potential and a high degree of mining interest and activity.

Response: The area is segregated in both the C and D alternatives. This conflict is thereby substantially reduced. Under alternative "C" the 37,000 acres have the highest wilderness values (DEIS p. 2-9). The 78,140 acres under alternative "D" by definition (DEIS p. 2-13) do not have major resource conflicts.

Question: Why does the preferred alternative recommend "no wilderness?"

43-8 BLM Allegation: The Burbank Canyons WSA has a large area on the north and west with high mineral potential and a high degree of mining interest.

Response: Again this area of 3425 acres is segregated under alternatives "C" and "D". The high quality wilderness values in Burbank Canyon, Little Burbank Canyon, and the north slopes of Rickey Canyon would be protected. The majority of resource conflicts and manageability problems would be eliminated. The remaining part of the unit can stand alone without the deleted acreage (DEIS p. 4-38).

Question: Why does the preferred alternative not recommend 9970 acres as suitable for wilderness designation?

43-9 BLM Allegation: The cherrystem roads and intrusive ways into the Burbank Canyons WSA create a management problem. Closure of the ways would work a hardship on traditional users.

Response: As reconfigured for alternatives "C" or "D" the area has one cherrystemmed inholding, and one faint trail (03) impacting (?) 200 acres in a small basin (WTR p. 39) The inholding is essesntially peripheral (WTR Map 12). Even a cursory glance at Map 10 (WTR) shows that the vast majority of the area is simply inaccessible to ORVs. The loss of one short, faint trail is hardly significant.

Question: Why doesn't the preferred alternative recommend 9970 acres as suitable for wilderness designation?

BLM Allegation: Ways in Redrock Canyon (W-29), Paint Rock Canyon (W-06), and Corral Tom Spring Extension (W-17) make management problems for ORV use. The 40-acre private inholding could be a management problem if access were requested. Closure of ways would work a hardship on traditional users.

Response: As there appears to be some confusion as to the names of the roads and canyon names on the map, I shall refer to them by number. Under alternative "C" W-06 and W-17 become part of the reconfigured boundary. W-29 is currently blocked to all but motorcycles and therefore poses a minimal problem. In any event, it follows the bottom of a wash. Under either alternative W-18 should be extended if necessary to gain access to the 40-acre inholding or it might be exchanged. The upper portion of W-06 also runs in a

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43-6 The summary offered in the WTR was deemed adequate to support the conclusions reached regarding energy and minerals. CEQ guidelines require that supplementary documents be referenced in the report, not included. To append an additional 80 pages of text and maps would add little to the report's integrity but would drive printing costs up prohibitively.

43-7 Selection of Alternative C or D might "substantially reduce" some resource conflicts but either would result in significant manageability conflicts because: (1) mining would likely take place up to the southern border of higher area, and; (2) the wilderness characteristics of much of the northern area would be rated as low.

43-8 The limited area under alternatives C and D would have been so small that manageability problems would have resulted. Moreover, because of topography in this WSA, adoption of C or D would have required construction of trails to prevent degradation of the wilderness values; construction of trails is contrary to management policy. Private land patterns and mining activity would preclude solitude. Outside sights and sounds would impinge upon the remaining wilderness characteristics of solitude and the opportunities for unconfined recreational activities (mandatory wilderness characteristics).

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Comment Letter 43

wash, so has a minimal effect, particularly as a boundary road. Roads going to range improvements have been cherrystemmed out. Most of the remaining ways in the redefined parcel of 27,860 acres either run in washes or are insignificant. Closure of ways would have little impact under alternative "C". Under alternative "D", W-29 remains naturally blocked. W-06 could become a problem, but over much of its length it follows the wash so that vehicular evidence should be ephemeral. The canyon may be physically hard to completely block, but a sufficient effort can be made and signs posted so that any potential trespasser would have no excuse of ignorance. Map 5 (WTR) indicates clearly that except for W-06 the major portion of the WSA is inaccessible to ORV uses anyway, particularly as configured for alternative "C" or "D". Even with W-06 the areas on either side are each sufficient to make a WSA! 43-10

Question: Why does the preferred alternative not consider either alternative "C" or "D" acreage as preferable?

There appears to have been a deliberate, major and gross violation of IMP for this WSA. It is my understanding that the Mineral County authorities used county equipment to illegally grade some 3.5 miles of W-29 and construct 2 miles of W-17! 43-11

Question: What if anything has been done to restore these areas to their former wilderness states?

Question: At whose expense?

Question: If nothing has been done -- why not?

Question: Were the perpetrators prosecuted? If not -- why not?

This is a fine WSA in its own right and some 68,170 acres ought to be recommended as suitable. Anything less would be a reward to these illegal despoilers who apparently sought to destroy this WSA before anyone else even had a say in the matter. These perpetrators must be shown that such activity will not be condoned. Why has the BLM apparently sanctioned this activity with its recommendation of non-suitability for the entire area?

Summary. As no significant adverse impacts have been documented for preferably 68,170 acres (Alternative "D") for the Gabbs Valley Range, this acreage should be recommended as suitable for designation as wilderness. An additional 9970 acres should be recommended as suitable in the Burbank Canyons WSA (Alternative "C" or "D"). In matters other than wilderness issues the preferred alternative "B" seems reasonable.

Sincerely,

Paul Clifford Jr.
2955 Berkshire
Cleveland Heights Ohio 44118

PC:hb

Response Letter 43

43-9 There are, in fact, four roads (not ways) and two inholdings involved. While the inholdings are peripheral, the nature of these patented lands (patented mining claims) suggests that there is real potential for degradation of the wilderness characteristics as mining activities expand. Further, the majority of the area is not inaccessible to such ORVs as motorcycles, ATVs, and four wheel drive vehicles.

43-10 W-29 is required for servicing and maintenance of a spring facility by the allottees. It also is used by hunters. W-29 is actually about two miles longer than it appears on the map, nearly connecting with W-14: ORV's can presently drive all the way across that part of the WSA. Virtually all of the area in Alternative C can be reached by ORVs using W-29 and taking advantage of topography. Although illegal travel in the WSA can be discouraged, "closure" is a practical impossibility. In regard to the area near W-06, the wilderness character in that vicinity is marginal at best.

43-11 W-17 and W-29 are ways that were present prior to the illegal construction activity. The county did blade these ways into roads as well as constructed new roads. None of these roads were considered in the proposal not to recommend the WSA for designation. Since Mineral County was informed that their road building activity was illegal and would have no effect on the status of the WSA they have cooperated fully with BLM by blocking

access to the newly built roads at their expense. Given this it was determined that prosecution would be inappropriate.

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Comment Letter 44

Tom Owen
Dist. Mngr., Carson City Dist.
Bureau of Land Mgt., USDI
1050 East William St., Suite 335
Carson City, NV. 89701

Regarding; Walker Resorce Management Plan, Specifically Stewart Valley Fossil Deposit Areas.

Dear Tom,

I find that I cannot support Dr. Scudder's proposal as is. Also my preference is for alternate A, although B is acceptable.

I am against any withdrawal of land from mining or mineral exploration in the valley. I firmly believe that BLM miners and scientists can and will work together if there are no "Big deals" made over land usage. Co-operation and common sense will make this possible.

Sincerely,
W.F. O'Malia "Biff"

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Comment Letter 45

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

January 25, 1985

Edward F. Spang
State Director
Bureau of Land Management
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

Dear Mr. Spang:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled RESOURCE MANAGEMENT PLAN, WALKER PLANNING AREA; MINERAL, LYON AND DOUGLAS COUNTIES, NEVADA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because: 1) description and protection measures for some water bodies and riparian vegetation were not adequate, 2) air quality and potential air impacts were either omitted or briefly discussed, 3) sections of the DEIS dealing with herbicides need to be expanded and 4) the rationale for recommending no wilderness study areas is unclear, especially when the Preferred Alternative is compared to Alternatives C and D. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send four copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Patrick J. Cotter, Federal Activities Branch, at (415) 974-0948 or FTS 454-0948.

Sincerely yours,
Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure

Comment Letter 45

-1-

Water Quality Comments

1. The FEIS should contain strong commitments for protection and enhancement of the beneficial uses and water quality in all major streams of the resource area.

45-1 a. Mitigation and protection, in the form of fencing to exclude livestock, is highly recommended for perennial streams, such as Rough Creek and Bodie Creek, or streams that are impacted by fecal contamination and total dissolved solids, such as Red Canyon Creek and Rough Creek (p. 3-3).

45-2 b. The FEIS should identify and discuss other thermal springs, such as Blue Link Spring, which may contain rare, threatened or endangered species. For those additional thermal springs where sensitive species were identified, appropriate mitigation measures should be proposed to protect the critical habitat.

2. 45-3 Riparian vegetation in the resource area is described as a "unique form of plant community" that provides a "fragile interface" between the desert and the stream communities. Riparian communities provide shade for fish that inhabit the streams of this region. Protection of the fisheries resources is one of the beneficial uses of the streams that should be mitigated in the management plan.

45-4 EPA recommends that the FEIS include a map depicting the location of the 103 riparian communities (p. 4-47) and those highlighted in Table 3-5. Accompanying information should include acreage, areas currently protected, and areas to be protected under each alternative. A discussion of BLM's reasons for not including the remaining riparian acreage in a mitigation proposal should also be presented.

45-5 The mitigation proposal should include fencing and rotational grazing management, among other means, to allow the sensitive riparian communities to recover from grazing activities (p. 2-19).

Air Quality Comments

1. 45-6 EPA's scoping letter, dated May 16, 1983, recommended that the DEIS should:

a. Describe existing air quality conditions in the resource area in terms of the National Ambient Air Quality Standards (NAAQS),

b. Identify impacts to air quality as a result of any of the alternatives,

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Response Letter 45

45-1 The RMP proposed protection for Red Canyon, Bodie and Rough Creeks (Pg. 2-5 No. 10).

45-2 No other thermal springs with potential habitat have been identified in the RMP area. If any are identified, BLM will support any reintroduction efforts (Pg. 2-5 No. 9).

45-3 The RMP proposes protection for all fisheries in the area, i.e., the 10.7 miles along E. Walker, Rough, Bodie and Red Canyon Creeks (Page 2-5 No. 10).

45-4 Since Council on Environmental Quality Regulations (1502.15) state that only enough data to understand the effects of the Alternatives should be included in the description of the existing environment, it would not be appropriate to include such a map.

No acreage figures are available on the 103 riparian communities. Areas currently protected are portrayed in Table 3-5. A list of riparian areas by alternative has been prepared, but was not included in the document since it would add little to the analysis. Furthermore, the list is subject to change as additional data is collected.

45-5 The Proposed RMP provides for the protection of all riparian areas identified as having moderate to high priority for protection. This amounts to a total of 27 areas to be

Comment Letter 45

c. Present mitigation measures which will be implemented to protect air quality.

The DEIS contained no such information.

2. The standard operating procedures listed in the DEIS indicate that "air quality will be protected...(according to) Nevada Ambient Air Quality Standards" (p. 2-28). Priority pollutant concentrations, particularly carbon monoxide (CO) and total suspended particulates (TSP), can increase substantially in a localized area during ORV events. These impacts need to be addressed in the FEIS.

45-7

3. EPA recommends analysis of potential air quality impacts, site specific and/or cumulative, for the following subjects:

a. Exploration and development of natural resources, including mining, geothermal and petroleum operations;

b. ORV uses (p. 2-22 and 3-28);

c. Construction and maintenance of roads and right-of-way corridors (p. 2-30 and 2-31);

d. Wind erosion impacts.

Pesticide Comments

45-8

1. The DEIS contains a single statement that mentions the use of herbicides as a tool for managing overgrowth of vegetation (p. 2-28). EPA recommends expanding this discussion to include the location of herbicide spraying activities, acreage to be treated, target species and ensuing environmental impacts to flora and fauna in the areas to be sprayed.

2. The FEIS should list all herbicides to be used in the resource area. The application of herbicides must conform to all Federal and state regulations. BLM should review current litigation and court decisions related to each herbicide listed for possible use in the resource area. A recent U.S. Supreme Court decision upholding the ruling of the U.S. Court of Appeals for the 9th Circuit, regarding herbicide worst case studies, could affect spraying and application of herbicides on BLM lands in Nevada.

Wilderness Study Area (WSA) Comments

In general, EPA recommends a reevaluation of Alternative B, the Preferred Alternative, to include portions of the WSAs listed as suitable for Alternatives C and D.

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Response Letter 45

protected over the next ten years. The proposed RMP provides for the maximum level of protection that could reasonably be expected to be implemented during the planning period. It would not be appropriate to develop proposals or mitigating measures without considering projected manpower and funding levels. Furthermore, the CEQ regulations do not require discussions of any mitigating measure was not included in an EIS, but do require that EISs be no longer than absolutely necessary to comply with NEPA and the CEQ regulations (40 CFR 1502.2(c)). In addition, it should be noted that the proposed RMP includes measures for fencing and rotational grazing management to improve riparian areas.

45-6 Since no air quality impacts could be determined, they were not discussed in the Draft as outlined on page 4-1. Any air quality mitigation required will be developed on a case by case basis as outlined in Standard Operating Procedure No. 4 on page 2-28 of the Draft. For information purposes the entire area attains air quality standards.

45-7 No significant site specific or cumulative air quality impacts were identified for ORV events or any of the other subjects mentioned. Air quality impacts will be analyzed through the environmental assessment process when specific proposals are submitted.

45-9 1. Table 1 (below) shows the disposition of acreage for each of the WSAs in Alternatives B, C and D. The designation of zero acres of suitable WSA in the Preferred Alternative is unclear when Alternative C, the Development Alternative, has 9,970 acres of Burbank Canyon and 27,860 acres of the Gabbs Valley Range declared as suitable for wilderness. The FEIS should reevaluate Alternative B to include at least as much wilderness area as Alternative C or present a detailed discussion about the nonsuitable nature of these areas.

Table 1. Summary of WSA Acreage

WSA	Total Acreage[1]	Presently Used[2]	Available Acreage[3]	Suitable Acreage Alt. B[4]	Alt. C[5]	Alt. D[6]
Burbank Canyons	13,395	2,197	11,198	0	9,970	9,970
Gabbs Valley Range	79.600	8,801	70,799	0	27,860	68,170

1) p. 2-15, Alternative E (All Wilderness Alternative)
2) Table 3-9
3) Total Acreage minus Present Use
4) p. 2-5, Alternative B (Preferred Alternative)
5) p. 2-9, Alternative C (Development Alternative)
6) p. 2-13, Alternative D (Wilderness Enhancement Alternative)

45-10 2. BLM should make all efforts to protect the beneficial uses of the East Walker River including irrigation, livestock watering, aquatic life and wildlife propagation, municipal and industrial uses, domestic water supply, recreation and body contact. Optimal flows should be determined to protect the water quality and beneficial uses of the river.

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45-8 The proposed RMP includes a measure for brush control on 500 acres or .0003 percent of the RMP area. The method for this brush control has not been determined; it could include chaining, burning, or spraying. The method will be determined at the allotment management planning stage of the RMP process only if the brush control proposal is carried through to that stage. If spraying is selected, it will be analyzed in detail as specified in Standard Operating Procedure No. 1 in the Draft. This analysis will include type of herbicide, location, acreage, target species, and environmental impacts. Herbicide application will conform to all Federal, state and local regulations.

The Supreme Court decision referred to is currently being evaluated for its effect on herbicide use on public land in Nevada.

45-9 BLM has the authority and responsibility for developing recommendations on the suitability or nonsuitability of areas for preservation as wilderness. The recommendation for nonsuitability in the Preferred Alternative for both WSAs was based on a detailed analysis by Carson City District Staff over a period of 5 years and in conformance to the Bureau's Wilderness Study Policy. This analysis was based on the two planning criteria and six quality standards outlined in that policy. The criteria require analysis of wilderness values and manageability. The quality standards require analysis of energy and other resource values; impact on other resources; impact of nondesignation on

Response Letter 45

wilderness values; public comment; local social and economic effects; and consistency with other plans. The analysis of all these factors resulted in the recommendation for nonsuitability in the Preferred Alternative.

The theme of Alternative C emphasizes commercial development subject to a moderate level of wilderness designation. The nondesignation recommendation in the Preferred Alternative is not in conflict with CEQ regulations or the Wilderness Study Policy. Neither requires that the Preferred Alternative recommend areas for designation or that it must recommend at least as much area as the "Development Alternative". Furthermore, the structure of the alternatives is within the authority of the preparing office. CEQ regulations require only that all reasonable alternatives be considered.

Detailed discussions about the nonsuitable nature of the WSAs as proposed in the Preferred Alternative would constitute a justification of that alternative. Such justifications would not be appropriate since Council on Environmental Quality regulations (40 CFR 1502.2(g)) state: "Environmental impact statements shall serve as a means of assessing the environmental impacts of proposed agency actions, rather than justifying decisions already made".

45-10 The Proposed RMP contains numerous measures for the protection of the East Walker River including expansion of the existing Scenic Area, implementation of livestock allotment management plans and wildlife habitat management plans along the river, protection of riparian habitat and fisheries, and acquisition of key wildlife habitat along the river. Proposals to regulate optimal river flows are beyond the scope of the Walker RMP since BLM has no jurisdiction or authority to regulate those flows.

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PART TWO

COMMENTS AND RESPONSES FROM THE NEVADA STATE GOVERNMENT CONSISTENCY REVIEW

The following section contains comments from State agencies on the Preliminary Final Resource Management Plan and Environmental Impact Statement and BLM's responses to those comments.

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Comment Letter

STATE OF NEVADA

RICHARD H. BRYAN
Governor

LINDA A. RYAN
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

May 13, 1985

Mr. Tom Owen, District Manager
Carson City District Office
Bureau of Land Management
1050 E. William Street
Carson City, Nevada 89710

Re: Governor's Consistency Review, SAI NV #85300020

Dear Mr Owen:

The State of Nevada has reviewed the Preliminary Final Resource Management Plan and Environmental Impact Statement for the Walker Resource Area. Our position on the two wilderness areas (NV-030-525A and NV-030-407) has not changed, as we continue to recommend the Bureau's preferred alternative. In reference to other resource concerns, we have attached the comments of the Nevada Department of Agriculture and the Division of State Parks. We also acknowledge your receipt of comments of the Nevada Department of Wildlife.

We would appreciate your consideration of State Agency comments in your decision process. Please feel free to contact us if you need additional information or state input on the Walker Resource Area.

Sincerely,

Linda A. Ryan
Director

LAR/kw

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Comment Letter

NEVADA STATE CLEARINGHOUSE

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 117
CARSON CITY, NEVADA 89710
885-4420

TO:

___ Governor's Office	___ Labor Commission	Conservation and Natural Resources
___ Attorney General	X Legislative Counsel Bureau	
___ Administration	___ Library	
X Agriculture	___ Prisons	X State Lands
___ Commerce	___ Public Service Commission	___ Conservation Districts
___ Community Services	___ Taxation	___ Environmental Protection
___ State Job Training Office	X Transportation	X Forestry
___ Economic Development	X UNR-Bureau of Mines	X Hist. Preservation & Archeology
___ Education	X UNR-Dept. of Range, Wildlife, and Forestry	X X State Parks
___ Employment Security Department	X X Wildlife	___ Water Planning
X Dept. of Minerals	___ Press Room-Capitol Building	X Water Resources
___ Equal Rights Commission	___ Nuclear Waste Project Office	___ _____
___ Human Resources	___ SCICC	___ _____
___ Indian Commission	___ State Communications Board	___ _____

FROM: John B. Walker, Coordinator

SAI NV # 85300057 PROJECT: Preliminary Final RMP/EIS for the Walker Resource Area

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:
1) the program's effect on your plans and programs;
2) the importance of its contribution to State and/or areawide goals and objectives;
3) its accord with any applicable law, order or regulation with which you are familiar and/or
4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN 5/15/85. Type your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office. Reviewers may substitue this form with agency letterhead. If letterhead is used, please site the SAI number listed above in your comment.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

___ No comment on this project	___ Conference desired (see below)
___ Proposal supported as written	___ Conditional support (outlined below)
___ Additional information (see below)	___ Disapproval of funding (must specify reason below)

Comments: (use additional sheets if necessary)

SEE ATTACHED COPY OF LETTER SENT TO THOMAS J. OWEN on 5/1/85.

Reviewer's Signature | Regional Coordinator Title | 789-0180 Phone | 05/01/85 Date

HH,

Comment Letter

STATE OF NEVADA

RICHARD H. BRYAN
GOVERNOR

STATE BOARD OF AGRICULTURE
ROBERT E. WRIGHT, CHAIRMAN
DON J. DAVIS
FREDERICA W. DRESSLER
DAVID H. FULSTONE II
M. KENT "TIM" HAFEN
HAROLD W. HALL
DONNELL J. RICHARDS
DARREL H. SOUTHWORTH
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THOMAS W. BALLOW, EXECUTIVE DIRECTOR
JACK N. ARMSTRONG, D.V.M., DIRECTOR
DIVISION OF ANIMAL INDUSTRY
PHILLIP C. MARTINELLI, DIRECTOR
DIVISION OF PLANT INDUSTRY
STEPHEN J. MAHONEY, DIRECTOR
DIVISION OF BRAND INSPECTION

DEPARTMENT OF AGRICULTURE
350 CAPITOL HILL AVENUE
(MAILING ADDRESS - P.O. BOX 11100, RENO, NEVADA 89510-1100)
(702) 789-0180

May 1, 1985

Thomas J. Owen, District Manager
Bureau of Land Management
Carson City District
1050 E. Williams Street, Suite 335
Carson City, NV 89701

Dear Mr. Owen:

We appreciate the opportunity to comment on the Final Walker Environmental Impact Statement and Proposed Resource Management Plan.

1 This Department is strongly opposed to the creation of the Marietta National Wild Burro Range. The document states that burro use will be the dominant use and that all other uses could be eliminated. This statement suggests that all use by livestock will be eliminated.

2 This document also states that the burros on the Marietta allotment need to be substantially reduced. It appears if the numbers of burros has increased to the point where you want to reduce the number of animals by twenty-five percent (25%) in the preferred alternative, then there is no need to reduce livestock numbers or create a National Burro Range.

3 If the Marietta National Burro Range is created, this Department feels that wild horses and burro fund monies should be used for range improvement projects instead of 8100 fund monies, especially if livestock numbers are reduced or eliminated.

Very truly yours,

Richard L. Rowe
Regional Coordinator

RLR:L

Response Letter

1. There are no plans to reduce or eliminate livestock in the proposed Burro Range. No reductions in livestock are projected to be necessary in the future, although additional wild burro gatherings will likely occur to maintain the current population of 129 burros.

2. The document does not state that burro numbers need to be reduced. In May, 1983 a total of 357 burros were removed from the Marietta area, leaving 129. It is believed that this reduction will result in a substantial improvement in range conditions. Range monitoring studies will be used to determine change in range condition.

3. Wild horse and burro funding will be used to implement range improvement projects which benefit wild burros within the proposed Burro Range.

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Comment Letter

NEVADA STATE CLEARINGHOUSE

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 117
CARSON CITY, NEVADA 89710
885-4420

TO:

__ Governor's Office	__ Labor Commission		
__ Attorney General	X Legislative Counsel Bureau	Conservation and Natural Resources	
__ Administration	__ Library		
X Agriculture	__ Prisons	X State Lands	
__ Commerce	__ Public Service Commission	__ Conservation Districts	
__ Community Services	__ Taxation	__ Environmental Protection	
__ State Job Training Office	X Transportation	X Forestry	
__ Economic Development	X UNR-Bureau of Mines	X Hist. Preservation & Archeology	
__ Education	X UNR-Dept. of Range, Wild life, and Forestry	X State Parks	
__ Employment Security Department	X Wildlife	__ Water Planning	
X Dept. of Minerals	__ Press Room-Capitol Building	X Water Resources	
__ Equal Rights Commission	__ Nuclear Waste Project Office	__ _____	
__ Human Resources	__ SHICC	__ _____	
__ Indian Commission	__ State Communications Board	__ _____	

FROM: John B. Walker, Coordinator

SAI NV # 85300057 PROJECT: Preliminary Final RMP/EIS for the Walker Resource Area

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:
1) the program's effect on your plans and programs;
2) the importance of its contribution to State and/or areawide goals and objectives;
3) its accord with any applicable law, order or regulation with which you are familiar and/or
4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN 5/15/85. Type your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office. Reviewers may substitute this form with agency letterhead. If letterhead is used, please site the SAI number listed above in your comment.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

__ No comment on this project	__ Conference desired (see below)
X Proposal supported as written	__ Conditional support (outlined below)
X Additional information (see below)	__ Disapproval of funding (must specify reason below)

Comments: (Use additional sheets if necessary)

4 The recommended Alternative B seems to be well balanced in almost every respect. Our only concern is the adequecy of protection afforded the East Walker River Scenic Area with "continued segregation from mineral entry". According to response 40-1, this action will merely remove this area from entry for "a limited period".

[signature] Asst Administrator 885 4370 4/23/85
Reviewer's Signature Title Phone Date

4-101

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Response Letter

4. The segregation will remain in effect pending an analysis to determine if withdrawal is appropriate.

446.

Comment Letter

Response Letter

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STATE OF NEVADA
DEPARTMENT OF WILDLIFE
1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 789-0500

RICHARD H. BRYAN
Governor

WILLIAM A. MOLINI
Director

May 13, 1985

Mr. Thomas Owen
District Manager
Bureau of Land Management
1050 E. William Street, Suite 335
Carson City, NV 89701

Dear Tom:

We appreciate the opportunity provided us to comment on the final environmental statement and resource management plan for BLM's Walker Resource Area. We have reviewed the document in light of our earlier review of the DEIS and offer the following comments.

We believe that wildlife needs and associated values on the Walker Resource Area easily justify greater management emphasis than is provided in the FEIS. We feel that most of the concerns we discussed in our comments on the DEIS were not adequately addressed in the FEIS.

5 In the draft plan, we voiced concern with the categorization of the Risue, Four-Mile, Saroni Canal, Topaz, and Wildoats allotments as "custodial management" allotments. The "C" categorization suggests that these allotments are currently being satisfactorily managed, are producing near their potential, have few, if any, conflicts/controversy, and do not have potential for positive economic return on investment (USDI, BLM Instructional Memo 82-292). Apparently, designation of these allotments as custodial was based upon the fact that public lands constituted less than 25 percent of each operation which does not appear to be a viable criterion for "C" categorization. We continue to believe that these allotments should be categorized as "Improve". We believe that an "I" categorization would lead to management practices that would result in improvement of wildlife values and reduction of conflicts on the allotments, to the benefit of the public and the permittees. We would like to see these allotments included with the other "I" allotments and prioritized for development of allotment management plans with our agency as a contributor. We would also like to encourage the use of Coordinated Resource Management Planning in development of future AMP's in the resource area.

5. Our analysis of the allotments referred to indicates that they most appropriately fall into the "C" category. The categorization was done in accordance with Instruction Memo 82-292. That Memo states that allotments in a category do not have to meet all the criteria for that category. The subject allotments were placed in the "C" category due to the low potential for a positive return on investments, and the fact that current management is satisfactory. While it is recognized that there are some wildlife related conflicts, these are not sufficient to justify placing the allotments in an "I" category.

No Allotment Management Plans (AMPs) are scheduled for these allotments since other allotments have higher priority. The allotments will continue to be monitored to determine if AMPs should be developed and if the allotments should be re-categorized.

It is Bureau policy to encourage the use of Coordinated Resource Management Planning in the development of AMPs. We would welcome any assistance or contributions the Department of Wildlife could provide in that process.

Comment Letter

Response Letter

6 We did not support the Marietta National Burro Range because we feel that it presents a threat to the potential bighorn sheep reintroduction in the Excelsior Mountains. We agree with BLM's response that proper water developments would reduce conflict potential; however, those developments are not identified in the RMP. Will failure to put such water developments in the plan now result in problems implementing them when reintroduction of sheep occurs?

7 We disagree with BLM's contention that local income and employment are the most appropriate measures of economic value of wildlife in the resource area. Table 2 in our comments on the draft was, however, our estimate of wildlife-generated income to Mineral County. We do not believe that economic analysis should be limited to big game and the trout fishery because those are the only resources that will be impacted. The nature of wildlife habitat is such that any action that affects big game and/or a fishery also directly affects small game, nongame, and furbearers. Hence, we believe our presentation of values for those resources was entirely appropriate.

According to several wildlife economists (e.g., "An Introduction to Wildlife Valuation Techniques," C.F. Sorg and J. Loomis, Wildlife Soc. Bull. 13:38-46, 1985), because wildlife is a non-market resource, some measures of consumer surplus, such as willingness-to-pay, is the appropriate measure of economic value of wildlife. This contention is supported by USDI, BLM Instructional Memo 83-27. Therefore, we feel that the data presented in Table 1 of our comments on the draft represent the best available analysis of wildlife economic value in the Mineral County portion of the Walker RA. The wildlife/fishery user day (WFUD) values developed by U.S. Forest Service and used in that table are estimates of consumer surplus associated with consumptive use of wildlife.

If we can provide additional information or answer any questions, please let me know.

Sincerely,

William A. Molini
Director

cc: John Walker, State Clearinghouse
Region I

6. The need for water developments will be determined during the activity planning process for the reintroduction. Specific developments need not be identified in the RMP in order to be implemented.

7. We did not state that local income and employment were the most appropriate measures of wildlife value. Our statement referred to the regional economic impact of wildlife, not value. In the Bureau's planning process regional economic impacts are analyzed at the RMP/EIS stage. Wildlife values are included at the activity planning stage in benefit/cost analyses.

While it is recognized that actions which affect big game or fisheries can effect small game, nongame, and furbearers, no such effects were projected or quantified in the analysis of impacts resulting from the RMP. Without such projections and quantification, economic impact analysis of those species is inappropriate.

John Loomis, co-author of the report referred to was contacted in regards to this comment. He stated that while consumer surplus is the appropriate measure for wildlife value, income and employment are the appropriate measures for regional economic impact analysis. BLM Instruction Memo 83-27 refers to wildlife values for use in benefit/cost analysis, not to economic impact analysis in Environmental Impact Statements.

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Comment Letter

Division of State Lands
State Land Office
State Land Use Planning Agency
(702) 887-4161

STATE OF NEVADA

Address Reply to:
Division of State Lands
201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710

BUR OF LAND MANAGEMENT
CARSON CITY DISTRICT OFFICE

MAY 21 10 50 AM '85

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Division of State Lands

May 14, 1985

John Walker
State Clearinghouse
Office of Community Services
Capitol Complex
Carson City, Nevada 89710

SUBJECT: SAI NV 85300057

Dear John:

We have reviewed the preliminary Walker Resource Management Plan and Final Environmental Impact Statement. A comparison was made between the proposed plan and the comments we made on the draft plan. Except for a few minor differences, which we have no problems with, we feel the proposed final plan is in substantial conformity with comments made by this agency. Overall, we feel the plan is a balanced and sensible plan for the Bureau of Land Management lands in the Walker Resource Area and seems to adequately address the concerns of the citizens of the area.

Plans for the public lands, proposed pursuant to Senate Bill 40 of the Sixty-Second Session of the Nevada Legislature, have been completed, or are nearing completion, for the counties which comprise the Walker Resource Area. We would urge the Bureau of Land Management to consider the policies of those plans and work with the local governments as they implement the Walker Resource Management Plan.

We appreciate the opportunity to review the preliminary plan.

Sincerely,

Mike Del Grosso

Mike Del Grosso
Land Use Planner

JMD:jsd

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Comment Letter

BLM CC PT 85 014 1792

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